

<u>Date</u>	<u>Atty</u>	<u>Hours</u>	<u>Description</u>
3/21/2001	PJS	0.5	Review MCHR probable cause finding; conference w/ colleague RAS
5/14/2001	PJS	0.5	Research re: class actions
5/14/2001	PJS	1.0	Research re: class action; conference w/ colleague JC
5/29/2001	PJS	0.8	Telephone conference with Wilma Neal (3) re: 1981 claim
5/30/2001	PJS	0.5	Draft questions for potential clients
5/31/2001	PJS	4.0	Meeting w/ potential clients in Baltimore; conference w/ colleague RAS re: same; travel
6/2/2001	PJS	0.5	Telephone call Brent Garren re: theory of discrimination, class action
6/4/2001	PJS	0.4	Draft designation of representative form
6/4/2001	PJS	0.5	Telephone call w/ Wilma Neal, Brent Garren, Russell Johnson re: theory of case, meeting w/ current employees
6/6/2001	PJS	0.5	Conference w/ colleague DBH, RAS re: class and retainer
6/6/2001	PJS	1.0	Draft retainer; conference w/ colleague DBH re: same; research re: same
6/6/2001	PJS	1.5	Meeting w/ class members, Lloyd, White, Newsome
6/11/2001	PJS	0.8	Research re: class action harassment
6/11/2001	PJS	1.8	Telephone conference with Garren re: complaint; Wilma Neal re: meeting on Tuesday; telephone conference with client Veronica Johnson and Celeste Ireland; telephone call w/ Russell Johnson, Stephen Lentz
6/12/2001	PJS	1.8	Meetings w/ RAS, partners re: labor settlement and impact; telephone call w/ Joseph Lloyd re: litigation
6/12/2001	PJS	2.0	Meeting w/ clients re: retainer and litigation
6/13/2001	PJS	0.3	Draft letter to Carol Uhler-Ford re: designation of representative
6/13/2001	PJS	0.6	Telephone call w/ Brent Garren re: litigation, retainer; conference w/ colleagues RAS, DBH re: same
6/18/2001	PJS	0.5	Letter to Uhler-Ford; review designation/confidentiality forms
6/20/2001	PJS	0.3	Conference w/ colleague DBH re: litigation
6/20/2001	PJS	0.4	Telephone call w/ Lee Hoshall re: complaint posture and possible settlement
6/22/2001	PJS	0.5	Telephone conference with client Melvin Newsome re: litigation and Md. State conciliation; telephone call w/ Wilma Neal re: same; conference w/ colleague RAS re: same
6/25/2001	PJS	0.4	Telephone call w/ Brent Garren re: settlement language
6/29/2001	PJS	0.5	Telephone conference with client Melvin Newsome re: draft complaint; conference w/ colleague RAS re: R. Curtis, complaint, Ashley
6/29/2001	PJS	0.6	Review MCHR written findings
6/30/2001	PJS	0.5	MCHR document review
6/30/2001	PJS	3.2	Continue draft of class complaint; legal research
6/30/2001	PJS	4.0	Draft class complaint; legal research
7/2/2001	PJS	0.3	Telephone call w/ Charles Mann; draft letter to Mann; send documents to Mann
7/2/2001	PJS	0.4	Telephone conference with client Melvin Newsome; draft letter to Ms. Uhler-Ford re: Hilliard
7/2/2001	PJS	0.9	Conference w/ colleague RAS, DBH re: complaint; continue draft of complaint
7/3/2001	PJS	0.5	Research re: statistical analysis
7/9/2001	PJS	0.4	Telephone conference with client H. Datcher, M. Newsome re: meeting, complaint
7/10/2001	PJS	0.3	Telephone call w/ DBH re: class complaint; conference w/ colleague RAS
7/11/2001	PJS	0.2	Letter to CUF re: Curtis
7/11/2001	PJS	1.6	Meeting w/ clients
7/12/2001	PJS	3.1	Meeting w/ clients re: complaint
7/16/2001	PJS	1.5	Continue draft of class complaint
7/17/2001	PJS	2.2	Continue draft of class complaint; confer w/ DBH, RAS re: same

<u>Date</u>	<u>Atty</u>	<u>Hours</u>	<u>Description</u>
7/19/2001	PJS	1.2	Review documents received from MCHR; continue draft of complaint
7/29/2001	PJS	0.5	Draft press release
8/1/2001	PJS	2.0	Telephone conference with client MN re: filing; prepare Rule 4 notice; telephone call w/ BS re: complaint; draft letter to Jeanne Phelan
8/8/2001	PJS	0.4	Telephone calls w/ Russell Johnson and Melvin Newsome re: designation of rep. forms
8/27/2001	PJS	1.7	Legal research re: class actions, including review of Maryland District Court opinions
8/31/2001	PJS	0.3	Review designation forms; Letter to Uhler-Ford
9/4/2001	PJS	0.2	Telephone conference with client w/ Melvin Newsome re: designation of representative forms
9/6/2001	PJS	0.3	Review documents from MCHR
5/26/2003	PJS	2.0	Cont. digest of B Minetree Vol I
10/1/2001	PJS	0.4	Draft letter to MCHR re: FOIA
10/4/2001	PJS	0.4	Telephone conference with client Newsome and Datcher
10/8/2001	PJS	0.5	Review scheduling order and answer
10/9/2001	PJS	0.5	Letter to Mann; file administration
10/10/2001	PJS	2.6	Conference w/ colleague DBH, RAS re: scheduling order & experts; draft scheduling order; research re: same; telephone call w/ MN & RJ re: client meeting; telephone call w/ D. Deramus
10/15/2001	PJS	0.2	Review scheduling order
10/15/2001	PJS	0.3	Review scheduling order from Smalkin
10/15/2001	PJS	2.6	Draft discovery responses; telephone call w/ D. Deramus re: discovery; legal research re: UTD laundry; document review
10/15/2001	PJS	6.0	Telephone conference with clients Curtis, Johnson; draft discovery requests
10/16/2001	PJS	0.4	Telephone call w/ Brent Garren re: settlement
10/16/2001	PJS	2.5	Meeting w/ Charles Mann; revise discovery requests
10/17/2001	PJS	0.8	Draft discovery questions
10/18/2001	PJS	0.5	Call potential witnesses re: meeting
10/18/2001	PJS	4.0	Meeting w/ clients in Baltimore re: litigation (and travel)
10/24/2001	PJS	1.0	Draft discovery requests; conference w/ colleague DBH re: same
11/19/2001	PJS	0.3	Review motion to amend
12/3/2001	PJS	0.4	Telephone call w/ Carol Uhler-Ford (2) re: subpoena and designation of representative forms
12/4/2001	PJS	0.3	Telephone call w/ Bob Abrech, Paychex
12/4/2001	PJS	0.5	Draft subpoena duces tecum
12/4/2001	PJS	0.7	Telephone conference with client MN re: discovery, settlement offer (rumor)
12/5/2001	PJS	0.1	Telephone conference with client MN re: discovery
12/10/2001	PJS	0.4	Telephone call w/ Jeanne Phelan re: discovery extension, settlement parameters; conference w/ colleague RAS re: same
12/11/2001	PJS	0.9	Draft subpoena, letter and notice of deposition; conference w/ colleague RAS
12/12/2001	PJS	0.2	Telephone call w/ Russell Johnson re: designation forms
12/12/2001	PJS	0.2	Draft letter to Russell Johnson
12/12/2001	PJS	0.5	Draft letter and affidavit for Abresch at Paychex
12/13/2001	PJS	0.5	Paychex document review
12/13/2001	PJS	1.4	Draft letter to clients re: settlement; review documents from Paychex; create client database
12/18/2001	PJS	0.2	Draft letter to J. Phelan re: discovery
12/18/2001	PJS	0.4	Draft letter to MCHR clients
1/2/2002	PJS	3.5	Draft letter re: discovery to J Phelan; conference w/ colleague RAS
1/4/2002	PJS	0.3	Telephone call w/ Linda Johnson re: settlement
1/7/2002	PJS	0.5	Telephone call w/ C. Uhler-Ford re: subpoena (extension of time until Friday); M Newsome re: case status

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1/7/2002	PJS	1.9	Telephone call w/ Brent Garren re: potential mediation w/ Larry Wolf; draft 30(b)(6) deposition notice; legal research re: production of computerized data; conference w/ colleague RAS re: same
1/9/2002	PJS	0.7	Telephone conference with R Johnson, client M Newsome re: MCHR documents; telephone call w/ Larry Wolfe re: potential settlement conference; conference w/ colleagues DBH, RAS re: settlement
1/11/2002	PJS	0.4	Telephone call w/ C. Uhler-Ford, R Johnson re: documents; telephone call w/ Jeanne Phelan re: discovery issues
1/14/2002	PJS	2.4	Meeting w/ clients; review subpoena documents; conference w/ colleague RAS; discovery research re: potential witnesses; draft subpoena and letter to John Fitzgerald
1/15/2002	PJS	0.5	Telephone call w/ L. Wolfe re: settlement; draft letter to J Phelan re: discovery; conference w/ colleague RAS, DBH re: same
1/15/2002	PJS	4.0	Review documents produced by MCHR
1/16/2002	PJS	0.7	Draft letter to Phelan re: protective order; review local rules
1/16/2002	PJS	2.5	Continue review of MCHR documents; conference w/ colleague RAS re: statistical data
1/17/2002	PJS	0.4	Telephone call w/ Jeanne Phelan re: scope of protective order; conference w/ colleague DBH re: same
1/17/2002	PJS	0.5	Draft waivers of service for amended complaints, letter to Phelan, memo to JNT
1/17/2002	PJS	0.5	Telephone conference with client MN re: settlement; telephone call RJ re: costs
1/17/2002	PJS	0.5	Review documents provided in discovery by MCHR
1/22/2002	PJS	0.2	Draft notice of subpoena
1/22/2002	PJS	0.4	Telephone call w/ C. Uhler-Ford re: documents; telephone call w/ Jeanne Phelan re: discovery; review Minetree bankruptcy
1/22/2002	PJS	0.6	Review protective order; conference w/ colleague RAS re: same; draft letter to J. Phelan re: same
1/24/2002	PJS	0.4	Review statistical data
1/24/2002	PJS	0.5	Telephone call w/ J Phelan re: discovery issues
1/24/2002	PJS	1.0	Telephone conference with client MN re: settlement; conference w/ colleague RAS, DBH re: same
1/28/2002	PJS	0.5	Conference w/ colleagues DBH, RAS; Meeting w/ Boris Steffen re: settlement conference
1/28/2002	PJS	0.5	Telephone call w/ M. Newsome re: settlement
1/28/2002	PJS	0.6	Draft letter to J. Phelan re: discovery and settlement
1/28/2002	PJS	2.5	Settlement conference and follow-up with Boris Steffen and DBH
1/31/2002	PJS	0.2	Draft letter to B. Steffen re: protective order
1/31/2002	PJS	0.5	Prepare for deposition of John Fitzgerald, including document review and telephone calls w/ J Fitzgerald (2)
1/31/2002	PJS	1.2	Prepare for J. Fitzgerald deposition
1/31/2002	PJS	4.0	Prepare for deposition of John Fitzgerald, including document review
2/1/2002	PJS	0.5	Review documents produced in discovery; telephone call w/ B. Steffen re: same
2/1/2002	PJS	1.0	Prepare for J Fitzgerald deposition
2/1/2002	PJS	4.0	J. Fitzgerald deposition (11-3)
2/26/2002	PJS	1.1	Draft motion to stay; telephone call w/ JP re: same; telephone call w/ BS re: labor costs
2/28/2002	PJS	1.4	Telephone call w/ BS re: information and documents; draft letter to Phelan
4/10/2002	PJS	0.3	Conference w/ colleague RAS re: scheduling and Steffen; memo to Steffen
4/12/2002	PJS	0.2	Draft letter to Phelan re: financial data
4/12/2002	PJS	0.4	Telephone conference with client Joseph Lloyd re: litigation
4/24/2002	PJS	0.2	Conference w/ colleagues re: extension; telephone call w/ J. Phelan re: same
4/24/2002	PJS	0.4	Draft letter to Phelan re: fees

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4/25/2002	PJS	0.7	Draft motion to extend stay; conference w/ colleague DBH
5/21/2002	PJS	2.0	Meeting w/ Boris Steffen re: financial data; conference w/ colleagues DBH and RAS
6/12/2002	PJS	0.4	Telephone conference with client M. Newsome; Boris Steffen re: settlement
6/12/2002	PJS	5.0	Prepare for settlement meeting; settlement meeting and travel
7/2/2002	PJS	0.3	Telephone conference with J. Phelan re: settlement
7/3/2002	PJS	0.2	Telephone call w/ Boris Steffen re: settlement
7/23/2002	PJS	2.0	Meeting w/ Charles Mann and prepare for meeting; telephone call w/ C. Uhler-Ford
7/29/2002	PJS	1.0	Draft letter to Phelan; telephone calls w/ clients RC, HD; review discovery; research re: David Minetree
8/5/2002	PJS	2.8	Document review; confer w/ Boris Steffen; draft letter; conference w/ colleagues re: settlement and discovery
8/6/2002	PJS	5.3	Telephone call w/ L. Wolf re: settlement; telephone call w/ S. Boyd re: litigation; conference w/ colleague RAS re: settlement and litigation; legal research re: class action settlement; research re: pot's class members and David Minetree subpoena; draft settlement letter to L Wolf, J Phelan
8/7/2002	PJS	0.5	Draft letter to J Phelan
8/7/2002	PJS	0.9	Legal research re: FRCP 23(e)
8/7/2002	PJS	1.1	Research re: potential witnesses including N Stair, B Minetree, D Minetree
8/7/2002	PJS	2.0	Discovery database statistical analysis
8/8/2002	PJS	0.5	Review discovery re: motion to compel
8/9/2002	PJS	0.5	Letter to J Phelan re: discovery
8/9/2002	PJS	0.9	Research re: locating potential witnesses
8/28/2002	PJS	2.0	Draft letter to J Phelan re: discovery; conference w/ colleague RAS re: racial identification; review discovery responses; telephone call w/ H. Datcher; review excel spreadsheet data
9/6/2002	PJS	2.5	Draft letter to J Phelan re: discovery; telephone call w/ JP re: same; research re: potential witnesses; telephone conference with client MN re: D Minetree
9/9/2002	PJS	3.0	Draft Minetree subpoena; review bankruptcy records at Md. D.Court and travel
9/10/2002	PJS	0.2	Draft letter to client MN re: DofR forms
9/10/2002	PJS	0.3	Draft letter to C. Uhler-Ford re: Sharon Boyd
9/10/2002	PJS	4.0	Draft revised scheduling order and motion; telephone call w/ JP re: same; review statistical data re: pay rates and racial identification and workers employed 3rd and 4th Qs 1998; draft letter to C. Mann; telephone call w/ C Mann re: statistical analysis; telephone call w/ Boris Steffen re: financial analysis; conference w/ colleague RAS re: statistical database and scheduling order
9/11/2002	PJS	0.2	Draft letter to Minetree
9/11/2002	PJS	0.3	Telephone conference with client Rudolph Curtis re: case status
9/11/2002	PJS	0.5	Draft letter to Charles Mann re: statistics
9/11/2002	PJS	4.0	Review 1998 statistical pay data; conference w/ colleague DBH, RAS re: same
9/12/2002	PJS	0.2	Conference w/ colleague DBH re: statistical analysis
9/12/2002	PJS	0.3	Telephone call w/ C. Uhler-Ford re: status of litigation
9/12/2002	PJS	2.5	Draft discovery responses; legal research re: 26(b)(3)
9/12/2002	PJS	3.5	Review payroll discovery re: statistical analysis
9/17/2002	PJS	0.5	Draft letter to J Phelan re: discovery issues
9/17/2002	PJS	2.8	Review MCHR personnel database
9/18/2002	PJS	0.2	Draft letter to C. Uhler-Ford re: Wheatfall
9/18/2002	PJS	3.1	Continue review of MCHR personnel database
9/20/2002	PJS	5.0	Review personnel records in Baltimore; travel; telephone call w/ JP re: same
9/23/2002	PJS	0.3	Telephone call w/ B Garren re: settlement

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9/25/2002	PJS	0.5	Meeting w/ client M Newsome re: litigation and settlement
9/25/2002	PJS	1.0	Prepare for document review in Baltimore
9/25/2002	PJS	1.0	Analyze data for geographical variation
9/25/2002	PJS	4.0	Document review at JP office in Baltimore, including travel time
9/27/2002	PJS	0.6	Draft discovery request (3rd)
9/27/2002	PJS	1.0	Review statistical data
10/1/2002	PJS	3.5	Review 1999 statistical data
10/2/2002	PJS	0.3	Telephone call (2) w/ defendant's paralegal re: discovery review
10/2/2002	PJS	1.8	Legal research re: motion to compel
10/3/2002	PJS	0.3	Conference w/ colleague DBH re: class action settlement
10/3/2002	PJS	0.5	Telephone conference with Lee Hoshall re: litigation
10/7/2002	PJS	1.8	Draft motion to compel
10/8/2002	PJS	0.4	Continue draft letter to J Phelan
10/8/2002	PJS	0.5	Conference w/ colleague RAS re: discoverability of personnel documents
10/8/2002	PJS	0.5	Continue draft of motion to compel
10/8/2002	PJS	0.5	Review statistical data for the purposes of document copying
10/8/2002	PJS	0.6	Draft notice of deposition: Weyrich; telephone calls w/ B Steffen and J Phelan re: same
10/8/2002	PJS	0.7	Draft letter to J Phelan re: discovery and motion to compel
10/8/2002	PJS	1.5	Continue draft of motion to compel
10/8/2002	PJS	5.4	Draft motion to compel
10/9/2002	PJS	0.2	Revise notice of deposition
10/9/2002	PJS	0.5	Analysis and review of 1998 payroll data w/ JNT re: personnel files
10/9/2002	PJS	1.8	Research and analysis re: personnel files to be copied
10/18/2002	PJS	0.7	Telephone call w/ Charles Mann re: database; conference w/ colleague DBH re: statistical analysis
10/21/2002	PJS	1.2	Meeting w/ Dr. Mann
10/21/2002	PJS	3.5	Prepare for meeting with expert Dr. Mann, including document review and review of MCHR database
10/24/2002	PJS	0.4	Draft letter to J Phelan re: fees
10/28/2002	PJS	0.3	Telephone call w/ JP re: scheduling depositions and discovery
10/28/2002	PJS	0.4	Telephone call w/ Boris Steffen re: Weyrich deposition
10/28/2002	PJS	1.5	Prepare for Weyrich deposition
10/29/2002	PJS	1.5	Meeting w/ Boris Steffen re: deposition of Weyrich; conference w/ colleague DBH re: same
10/29/2002	PJS	4.8	Prepare for deposition of Weyrich, including document review; e-mail to J Phelan
10/30/2002	PJS	0.5	Meeting w/ Boris Steffen re: deposition of Weyrich
10/30/2002	PJS	0.5	Conference w/ colleague DBH re: deposition; draft e-mail to J Phelan re: pending discovery
10/30/2002	PJS	1.0	Prepare for deposition of Weyrich
10/30/2002	PJS	5.5	Deposition of Carroll Weyrich (10-3:30)
10/31/2002	PJS	0.4	document review; telephone conference with client Melvin Newsome re: litigation status
11/1/2002	PJS	1.7	Prepare for document review at UTD, including review of personnel files to review
11/1/2002	PJS	7.0	Document review in Baltimore (12:30 to 5:30 and 2 hours travel time)
11/4/2002	PJS	0.7	Subpoena duces tecum and letter to Brent Garren
11/5/2002	PJS	0.2	Telephone conference with client M Newsome re: Minetree deposition
11/5/2002	PJS	0.6	Draft 30(b)(6) deposition notice; telephone call w/ Boris Steffen re: deposition of C Weyrich
11/5/2002	PJS	0.6	Draft pleading re: expert extension; conference w/ colleague DBH re: same
11/5/2002	PJS	0.8	Review statistical analysis to correct data discrepancies
11/6/2002	PJS	6.3	Document review, personnel files, at UTD (and travel time 2.0)
11/7/2002	PJS	0.2	Telephone call w/ J Phelan re: discovery and deposition

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11/7/2002	PJS	0.4	Revise motion re: scheduling order
11/7/2002	PJS	1.5	Review personnel files provided by defendant
11/7/2002	PJS	5.7	Prepare for deposition of Minetree
11/8/2002	PJS	1.0	Prepare for deposition of D. Minetree
11/8/2002	PJS	2.0	Travel to deposition (cancelled)
11/11/2002	PJS	3.0	Review statistical data and personnel files provided in discovery
11/12/2002	PJS	3.7	Analyze statistical data by zip code
11/13/2002	PJS	0.3	Revise scheduling order and fax to J Phelan
11/13/2002	PJS	0.4	Supplement discovery responses re: Charles Mann; telephone call w/ Mary Dunbar and Boris Steffen re: same
11/13/2002	PJS	0.4	Create list of 1998 employees for racial identification
11/13/2002	PJS	0.5	Telephone call w/ Charles Mann re: statistical analysis
11/13/2002	PJS	0.5	Draft memo to J Phelan re: outstanding discovery issues
11/13/2002	PJS	0.7	Investigation re: potential witnesses, including F Day, M Kennedy, L Marr and Amy Mattis
11/13/2002	PJS	2.6	Review statistical data by zip code
11/14/2002	PJS	0.2	Review Steffen resume
11/14/2002	PJS	0.3	Conference w/ colleague DBH, RAS re: statistical analysis
11/14/2002	PJS	0.7	Draft letter to J Phelan re: production of current employee list
11/14/2002	PJS	0.7	Draft letter to Phelan re: discovery pending and supplement of plaintiffs' discovery; create list of 1998 employees
11/14/2002	PJS	1.0	Continue statistical analysis of pay by address
11/15/2002	PJS	7.0	Review personnel records on-site at company (travel 2.0)
11/16/2002	PJS	1.4	Review personnel records
11/17/2002	PJS	3.5	Analyze personnel files for 1998 and 1999
11/18/2002	PJS	0.3	Draft 30(b)(6) notice of deposition
11/18/2002	PJS	0.3	Draft letter to J Phelan re: discovery
11/18/2002	PJS	0.4	Draft e-mail to J Phelan re: discovery issues and deposition of D Minetree
11/18/2002	PJS	0.5	Continue analysis of personnel files
11/18/2002	PJS	0.5	Review statistical analysis
11/18/2002	PJS	0.9	Continue review of personnel records re: geographical analysis
11/18/2002	PJS	1.0	Telephone call w/ Dr. Mann; conference w/ colleague DBH
11/19/2002	PJS	0.2	Telephone call w/ paralegal R Conetta re: document discovery issues
11/19/2002	PJS	0.3	Draft e-mail re: discovery to J Phelan, R Conetta
11/19/2002	PJS	0.6	Review pay information for 1999 employees
11/19/2002	PJS	0.7	Draft 30(b)(6) for financial issues; review Weyrich deposition; telephone call w/ Boris Steffen
11/19/2002	PJS	0.9	Continue pay analysis based on personnel records
11/20/2002	PJS	0.2	Telephone call w/ J Phelan re: scheduling order and pending discovery issues
11/20/2002	PJS	0.5	Continue review of personnel records re: pay and geographical analysis
11/20/2002	PJS	0.5	Telephone call w/ Charles Mann re: expert report; conference w/ colleague DBH; review personnel files
11/21/2002	PJS	0.2	Draft notice of deposition for Fran Berg
11/21/2002	PJS	0.4	Review motion re: scheduling; draft e-mail to J Phelan; telephone call w/ J Phelan re: same
11/21/2002	PJS	0.5	Review personnel records re: geographical analysis
11/22/2002	PJS	0.2	Draft notice of deposition F Berg
11/22/2002	PJS	0.4	Conference w/ colleague DBH re: statistical report
11/22/2002	PJS	0.5	Meeting w/ client H Datcher re: litigation and D Minetree
11/22/2002	PJS	0.6	Prepare for deposition of D Minetree
11/22/2002	PJS	0.7	Prepare for continuing deposition of D Minetree
11/22/2002	PJS	0.8	Review Dr. Mann statistical analysis
11/22/2002	PJS	1.0	Review statistical report
11/22/2002	PJS	3.6	Prepare for deposition of D Minetree

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11/22/2002	PJS	6.0	Deposition of D Minetree (and travel time)
11/25/2002	PJS	0.3	Review UNITE videotape
11/25/2002	PJS	0.4	Draft letter to J Phelan re: racial identification
11/25/2002	PJS	0.6	Telephone call w/ potential witness, Maria Espinoza
11/25/2002	PJS	0.6	Review discovery re: responses and pleading file re: scheduling orders
11/25/2002	PJS	0.7	Review racial identification information provided by UTD
11/26/2002	PJS	0.5	Review voucher issue
12/2/2002	PJS	0.4	Review MCHR files produced in discovery
12/2/2002	PJS	0.5	Draft motion to compel re: Minetree deposition responses
12/2/2002	PJS	0.9	Review personnel records re: voucher payments
12/3/2002	PJS	0.1	Draft e-mail to J Phelan re: deposition of David Minetree
12/3/2002	PJS	2.2	Draft motion to compel responses to deposition questions, including legal research
12/4/2002	PJS	0.2	Telephone conference with client Sharon Boyd re: case status
12/4/2002	PJS	0.5	Prepare motion to compel for filing
12/4/2002	PJS	0.6	Draft motion to compel deposition responses
12/4/2002	PJS	1.0	Draft reply to opposition to motion to compel
12/9/2002	PJS	0.4	Review D Minetree deposition transcript
12/9/2002	PJS	0.4	Draft notice of deposition for David Minetree; draft letter to Jeanne Phelan re: deposition and discovery
12/9/2002	PJS	1.0	Review D Minetree deposition transcript
12/9/2002	PJS	1.4	Review 1998 and 1999 employee database; meeting w/ JLC re: employee database
12/10/2002	PJS	0.1	Draft e-mail to J Phelan re: deposition schedule
12/10/2002	PJS	0.2	Draft letter to J Phelan re: B Steffen resume
12/10/2002	PJS	0.4	Conference w/ colleague JLC re: statistical database
12/10/2002	PJS	0.8	Legal research re: FRCP 30, 45
12/10/2002	PJS	1.1	Revise motion to compel, memo and order; legal research re: Rules 30, 45
12/10/2002	PJS	2.5	Draft motion to compel
12/11/2002	PJS	0.2	Telephone call w/ J Phelan re: discovery, deposition and scheduling order
12/11/2002	PJS	0.3	Conference w/ colleague JLC re: 1998 database
12/11/2002	PJS	0.7	Revise motion to compel; conference w/ colleague DBH re: same
12/11/2002	PJS	4.5	Prepare for deposition of Fran Berg
12/12/2002	PJS	0.5	File Motion to compel
12/12/2002	PJS	1.5	Prepare for deposition of F Berg
12/12/2002	PJS	4.7	Deposition of Fran Berg (including 2.0 hrs travel)
12/13/2002	PJS	0.2	Telephone call w/ J Phelan re: discovery & scheduling
12/13/2002	PJS	0.3	Telephone calls (2) w/ C Gold re: David Minetree
12/13/2002	PJS	0.4	Draft letter to plaintiffs
12/13/2002	PJS	2.0	Review personnel records re: vouchers
12/16/2002	PJS	1.4	Review probable cause findings
12/17/2002	PJS	0.2	Conference w/ colleague RAS re: litigation
12/17/2002	PJS	0.2	Draft amended notice of deposition for David Minetree
12/17/2002	PJS	0.2	Edit fourth discovery requests
12/17/2002	PJS	0.4	Legal research: certification of class in 4th Circuit
12/17/2002	PJS	0.4	Edit fourth discovery requests
12/17/2002	PJS	0.4	Conference w/ colleague RAS re: litigation
12/17/2002	PJS	0.5	Legal research: certification of class in 4th Circuit
12/17/2002	PJS	1.0	Draft amended notice of deposition for David Minetree
12/18/2002	PJS	5.5	Review accuracy of personnel database
12/19/2002	PJS	0.7	Telephone calls (2) w/ J Phelan re: personnel file review; telephone calls w/ Judge's chambers re: discovery dispute; conference w/ colleague RAS re: same

<u>Date</u>	<u>Attv</u>	<u>Hours</u>	<u>Description</u>
12/19/2002	PJS	0.8	Prepare for depositions of Nancy Stair and Brad Minetree, including document review
12/19/2002	PJS	1.4	Review Judge Gesner's Orders; prepare for oral argument; legal research
12/19/2002	PJS	3.9	Review accuracy of personnel database
12/20/2002	PJS	0.1	Draft e-mail to J Phelan re: discovery
12/20/2002	PJS	0.5	Telephone oral argument w/counsel & judge re: discovery of personnel records
12/20/2002	PJS	0.5	Draft supplementary discovery requests
12/20/2002	PJS	0.5	Conference w/ colleague JLC re: data analysis
12/20/2002	PJS	0.5	Draft letter to J Phelan re: document review
12/20/2002	PJS	1.5	Review personnel data
12/26/2002	PJS	1.5	Preparation for onsite review of personnel files
12/27/2002	PJS	6.0	Review personnel records at UTD (and 2.0 travel time)
12/29/2002	PJS	2.0	Review UTD personnel files
12/30/2002	PJS	1.4	Prepare for review of OPFs at UTD, including creation of employee review lists
1/2/2003	PJS	0.1	E-mail to J Phelan re: discovery review
1/2/2003	PJS	0.2	Telephone call w/ J Phelan re: scheduling order
1/2/2003	PJS	0.2	E-mail to J Phelan re: scheduling order
1/2/2003	PJS	0.2	Review Mike Ashley statement
1/2/2003	PJS	0.2	Conference w/ colleague JLC re: personnel file discovery review
1/2/2003	PJS	0.3	Draft letter to J Phelan re: 30(b)(6) depositions; review notices
1/2/2003	PJS	0.5	Telephone call w/ potential witness, Linda Marr
1/2/2003	PJS	1.5	Prepare for document review at UTD
1/2/2003	PJS	1.8	Investigation re: potential supervisory witnesses
1/3/2003	PJS	8.0	Review files at UTD in Baltimore
1/4/2003	PJS	2.8	Prepare for meeting w/ potential witness, including document review, M. Espinosa (and travel)
1/6/2003	PJS	0.1	Draft e-mail re: discovery to R Conetta
1/6/2003	PJS	0.2	Revise 30(b)(6) notice of deposition
1/6/2003	PJS	4.5	Review personnel records obtained from 1/3/03
1/7/2003	PJS	0.2	30(b)(6) notice of deposition re: financial information
1/7/2003	PJS	8.5	Review personnel data re: 1998 and 1999 databases
1/8/2003	PJS	0.7	Investigation and research re: potential witnesses, including location and information
1/8/2003	PJS	1.0	Research re: expert witness Murray Simpson
1/8/2003	PJS	1.5	Prepare for and meeting w/ expert re: database analysis
1/8/2003	PJS	3.0	Review personnel data re: 1998 and 1999 databases
1/10/2003	PJS	0.5	Conference w/ colleague DBH, BG re: David Minetree deposition
1/10/2003	PJS	0.5	Review 1997 Paychex data
1/10/2003	PJS	1.0	Document review re: personnel files
1/10/2003	PJS	1.5	Investigation re: locating potential witnesses, including former supervisory and HR employees
1/10/2003	PJS	2.2	Prepare for David Minetree deposition, including deposition review
1/10/2003	PJS	3.7	Meeting w/ potential witness Maria Espinosa and preparation for meeting
1/13/2003	PJS	0.8	Prepare for deposition of David Minetree
1/14/2003	PJS	0.3	Conference w/ colleague DBH re: deposition
1/14/2003	PJS	0.9	Legal research re: discoverability of medical records
1/14/2003	PJS	1.0	Continue prepare for deposition of David Minetree
1/14/2003	PJS	1.9	Deposition of David Minetree
1/14/2003	PJS	2.7	Conference w/ colleague BG re: defendants' discovery requests; legal research re: medical records
1/15/2003	PJS	0.4	Telephone conference with client M Newsome re: discovery
1/15/2003	PJS	0.4	Draft letter to J Phelan re: discovery
1/15/2003	PJS	0.4	Conference w/ colleague DBH re: class action compensatory damages

<u>Date</u>	<u>Atty</u>	<u>Hours</u>	<u>Description</u>
1/15/2003	PJS	0.5	Legal research re: 30(b)(6) depositions
1/15/2003	PJS	0.5	Conference w/ colleague BG re: discovery responses and document review re: same
1/15/2003	PJS	1.6	Document review re: upcoming depositions for 1/28, 2/4, 2/5
1/15/2003	PJS	2.5	Investigation re: potential witnesses, R Denton and others and including telephone calls with M Ashley and F Minniti
1/16/2003	PJS	4.0	Meetings w/ potential witnesses, M Ashley, A Mattis (and travel)
1/16/2003	PJS	4.0	Meetings w/ clients, Melvin Newsome and Joseph Lloyd (and travel)
1/17/2003	PJS	0.4	Review letter and e-mail from J Phelan re: deposition; draft e-mail to J Phelan re: deposition and outstanding discovery
1/17/2003	PJS	0.9	Investigatory research (including earnings) for Nancy Stair deposition
1/17/2003	PJS	1.4	Draft discovery responses and conference w/ colleague BG re: same
1/17/2003	PJS	1.5	Review documents for depositions of Nancy Stair and Brad Minetree
1/17/2003	PJS	1.5	Prepare discovery responses
1/20/2003	PJS	9.0	Interview potential witness, M Kennedy, and travel to and from Winston-Salem NC
1/21/2003	PJS	5.0	Cont. travel from Winston-Salem NC to WDC
1/22/2003	PJS	1.5	Legal research re: class action discovery issues, including release of information about putative class members
1/22/2003	PJS	1.9	Draft e-mails to J Phelan re: 30(b)(6) depositions and discovery issues; legal research re: 30(b)(6) depositions; review J Phelan e-mail re: same; telephone call w/ Judge Gesner's clerk re: scheduling oral argument
1/22/2003	PJS	5.0	Draft discovery responses, including conferences w/ colleague BG, document review and telephone calls with clients, R Curtis, V Johnson, J Lloyd, M Newsome
1/23/2003	PJS	0.4	Telephone conference with client Herbert Datcher re: discovery requests
1/23/2003	PJS	0.5	Telephone call w/ client Laverne Lipscomb re: discrimination
1/23/2003	PJS	0.5	Conference w/ colleague DBH re: statistical report and discovery requests; telephone call w/ C. Mann re: supplementary report
1/23/2003	PJS	0.5	Legal research re: class action discovery
1/23/2003	PJS	1.1	Review draft document responses for R Curtis and V Johnson
1/23/2003	PJS	1.4	Telephone call w/ Herbert Datcher re: discovery responses; draft discovery responses
1/23/2003	PJS	1.5	Telephone call w/ client Rudolph Curtis re: discovery requests and draft responses
1/23/2003	PJS	1.8	Review order from Judge re: discovery dispute; draft and edit pleading; conference w/ colleague BG re: same; review e-mail from J Phelan re: oral argument and pleadings; draft reply e-mail re: same
1/23/2003	PJS	3.5	Draft discovery responses, including review of MCHR documents
1/24/2003	PJS	0.5	Oral argument before Judge Gesner
1/24/2003	PJS	1.0	Prepare for oral argument, including legal research re: 30(b)(6) and conference w/ colleague BG re: legal and factual issues
1/24/2003	PJS	1.2	Conference w/ colleague BG re: plaintiffs' responses to defendants' discovery requests
1/24/2003	PJS	3.0	Review and revise plaintiff H Datcher's interrogatory responses
1/24/2003	PJS	3.0	Continue draft of interrogatory responses to No. 2, No. 4, including document review and witness research
1/25/2003	PJS	0.5	Draft memo re: factual and legal discovery analysis
1/25/2003	PJS	0.5	Review UTD documents provided to NLRB
1/25/2003	PJS	3.0	Continue draft of plaintiffs' responses to defendants' discovery requests
1/26/2003	PJS	0.4	Telephone call w/ potential witness, Nicole Johnson
1/26/2003	PJS	0.5	Continue draft of interrogatory responses
1/27/2003	PJS	0.3	Telephone call w/ Charles Mann re: statistical data
1/27/2003	PJS	0.6	Review defendants' documents provided to the NLRB
1/27/2003	PJS	2.5	Review Johnson interrogatory responses

<u>Date</u>	<u>Atty</u>	<u>Hours</u>	<u>Description</u>
1/27/2003	PJS	3.0	Review Newsome interrogatory responses
1/27/2003	PJS	8.0	Meeting w/ potential witness, F Minniti and travel
1/28/2003	PJS	0.4	Review letter from J Phelan; conference w/ colleague BG; and draft e-mail response to JP re: deficiencies
1/28/2003	PJS	0.5	Telephone call w/ J Phelan re: scheduling of depositions and discovery responses; conference w/ colleague BG re: same
1/28/2003	PJS	0.8	Review statistical report by C Mann; and draft letter and create data disk for J Phelan
1/28/2003	PJS	1.0	Research re: UTD at Baltimore library
1/28/2003	PJS	1.8	Review R Curtis interrogatory responses; conference w/ colleague BG re: same
1/28/2003	PJS	4.2	Draft and edit J Lloyd interrogatory responses
1/28/2003	PJS	6.5	Meeting w/ clients, H Datcher, J Lloyd and V Johnson re: discovery and travel
1/29/2003	PJS	0.2	Conference w/ colleague DBH re: evidentiary standard for admissibility on dispositive motion
1/29/2003	PJS	0.4	Telephone call w/ J Phelan re: 30(b)(6) and document discovery
1/29/2003	PJS	0.4	Conference w/ colleague BG re: discovery posture and depositions
1/29/2003	PJS	0.9	Document review of personnel files re: depositions of Brad Minetree and Nancy Stair
1/29/2003	PJS	1.4	Memo to file re: 30(b)(6) and legal research re FRCP 26(e)(1)
1/29/2003	PJS	1.5	Investigation, including potential witnesses, F Minniti, Richard Denton
2/3/2003	PJS	0.2	Telephone call w/ J Phelan re: document discovery and depositions
2/3/2003	PJS	0.2	Telephone call with J Phelan re: document discovery and depositions
2/3/2003	PJS	0.3	Conference w/ colleague BG re: document discovery
2/3/2003	PJS	0.5	Review documents produced in discovery by defendant
2/4/2003	PJS	0.4	Review of discovery documents to be listed but not provided to defendants
2/4/2003	PJS	0.5	Confer w/ BG re: deposition of N Stair and B Minetree
2/4/2003	PJS	0.6	Meeting w/ client H Datcher re: deposition and discovery
2/4/2003	PJS	1.0	Draft letter to J Phelan re: discovery
2/4/2003	PJS	1.1	Continue to prepare for N Stair deposition, including draft of questions and document and review of depositions
2/4/2003	PJS	1.2	Prepare for B Minetree deposition, including deposition and document review
2/4/2003	PJS	8.0	Prepare for deposition of Nancy Stair, including deposition and document review
2/5/2003	PJS	0.2	Memo to B Grdina re: class action litigation
2/5/2003	PJS	1.3	Prepare for deposition of N Stair, including document review and draft of questions
2/5/2003	PJS	9.5	Deposition of Nancy Stair (and travel time)
2/7/2003	PJS	0.5	Draft questions for potential case witnesses; conference w/ colleague TK re: investigation for potential witnesses
2/9/2003	PJS	0.3	Legal research
2/10/2003	PJS	0.1	Draft e-mail to J Phelan re: document discovery
2/10/2003	PJS	0.4	Prepare for deposition of Brad Minetree
2/11/2003	PJS	0.3	Draft letter to Linda Marr
2/12/2003	PJS	0.1	Legal research
2/12/2003	PJS	0.1	Draft memo to BG re: discovery questions
2/12/2003	PJS	0.5	Draft revised notice of deposition for B Minetree and 30(b)(6) witness
2/12/2003	PJS	10.0	Prepare for deposition of Brad Minetree, including document and deposition review, draft questions
2/13/2003	PJS	1.5	Continue preparation for B Minetree deposition, including review of N Stair deposition
2/13/2003	PJS	10.0	Deposition of Brad Minetree (and travel)
2/14/2003	PJS	1.0	Draft memo regarding outstanding discovery issues to be addressed by plaintiffs

<u>Date</u>	<u>Atty</u>	<u>Hours</u>	<u>Description</u>
2/14/2003	PJS	4.8	Draft and edit interrogatories, document requests and requests for admissions to defendants (and hand delivery)
2/15/2003	PJS	1.0	Draft letter to J Phelan re: outstanding discovery issues
2/17/2003	PJS	0.2	Review Agreement produced in discovery
2/17/2003	PJS	0.5	Draft letter to Moniodis
2/17/2003	PJS	1.4	Supplement discovery responses for plaintiffs
2/18/2003	PJS	0.2	Telephone conference with client M Newsome re: depositions and discovery requests
2/18/2003	PJS	0.5	Conference w/ colleague DBH re: litigation strategy, including potential deponents Bette, Moniodis, Weyrich
2/18/2003	PJS	0.8	Prepare for continuation of B Minetree deposition
2/18/2003	PJS	0.8	Legal research re: suing Wm. S. Stair trust
2/18/2003	PJS	3.1	Supplement discovery responses for all five plaintiffs, including document review
2/19/2003	PJS	0.3	Draft letter to client R Curtis
2/19/2003	PJS	1.5	Draft supplemental discovery responses
2/20/2003	PJS	0.2	Review statistical report
2/20/2003	PJS	0.3	Draft letter to G Moniodis re: deposition
2/20/2003	PJS	0.4	Draft letter to J Phelan re: supplementary discovery responses and additional discovery issues
2/20/2003	PJS	0.5	Conference w/ colleague BG re: scheduling of deposition, litigation strategy re: sanctions, motion for leave for discovery requests
2/20/2003	PJS	2.5	Draft supplemental discovery responses
2/24/2003	PJS	4.0	Draft supplemental discovery responses; motion to exceed
2/25/2003	PJS	3.4	Draft motion to exceed and order; legal research
2/26/2003	PJS	0.4	Conference w/ colleague BG re: outstanding discovery and depositions
2/26/2003	PJS	1.5	Continue draft and edit motion to exceed and order
2/26/2003	PJS	3.5	Statistical analysis of personnel data
2/27/2003	PJS	8.2	Prepare witnesses J Lloyd and H Datcher (and travel time)
2/28/2003	PJS	0.2	Draft discovery memo re: outstanding discovery for letter to J Phelan
2/28/2003	PJS	0.2	Telephone conference with C Mann re: expert report
2/28/2003	PJS	1.2	Edit J Lloyd interrogatory responses
3/1/2003	PJS	0.8	Review statistical reports by M Simpson and C Mann
3/1/2003	PJS	2.0	Review B Minetree deposition
3/2/2003	PJS	1.0	Review statistical data
3/2/2003	PJS	1.5	Review B Minetree deposition
3/3/2003	PJS	1.5	Legal research re: class action certification and statistical evidence; prepare reply to M. Simpson expert report
3/3/2003	PJS	1.7	Legal research re: class action certification and class action statistical evidence
3/4/2003	PJS	0.5	Telephone conference with C Mann re: M Simpson report
3/4/2003	PJS	0.5	Conference w/ colleague DBH re: M Simpson report
3/4/2003	PJS	1.0	Document review and statistical analysis re: 400/500
3/4/2003	PJS	1.0	Draft memo re: M. Simpson report
3/4/2003	PJS	1.4	Legal research re: class action certification
3/5/2003	PJS	0.9	Conference w/ colleague BG, DBH re: statistical analysis; telephone call w/ Charles Mann re: same
3/5/2003	PJS	2.8	Review accuracy of 400 and 500 department statistical data
3/6/2003	PJS	2.5	Review 400 and 500 department statistical data
3/11/2003	PJS	3.5	Attend deposition of Linda Marr
3/11/2003	PJS	3.5	Meeting w/ client V. Johnson, R. Curtis re: deposition and discovery and travel
3/12/2003	PJS	0.6	Draft letter to J Phelan re: discovery; review J Phelan letter re: discovery; conference w/ colleague BG
3/12/2003	PJS	4.5	Draft reply brief and legal research re: Rule 26 discovery; conference w/ colleagues DBH, BG re: same

<u>Date</u>	<u>Atty</u>	<u>Hours</u>	<u>Description</u>
3/13/2003	PJS	1.0	Edit reply brief
3/13/2003	PJS	2.0	Investigation and travel to houses of clients MN, JL, RC
3/13/2003	PJS	3.0	deposition (and travel time)
3/13/2003	PJS	7.0	Attend deposition of Herbert Datcher (10-5)
3/14/2003	PJS	0.2	Telephone conference with client M Newsome re: depositions
3/14/2003	PJS	0.3	Telephone call w/ J Phelan re: deposition scheduling
3/14/2003	PJS	0.8	Edit reply motion and file
3/14/2003	PJS	1.7	Prepare for T Hendrickson deposition, legal research re: waiver, conference w/ colleague BG re: questions and documents
3/15/2003	PJS	4.5	Prepare for deposition of Nancy Stair; review documents produced in discovery 3/13
3/15/2003	PJS	7.5	Meetings w/ clients M Newsome and Joseph Lloyd re: depositions; prepare for meetings
3/16/2003	PJS	0.3	Draft letter to J Phelan re: discovery and deposition scheduling
3/16/2003	PJS	1.3	Telephone call B Grdina re: deposition of T Hendrickson; review Grdina deposition outline
3/17/2003	PJS	2.0	Take N Stair deposition
3/17/2003	PJS	3.0	Meeting w/ Rudolph Curtis re: deposition
3/17/2003	PJS	4.5	Attend T Hendrickson deposition
3/18/2003	PJS	0.2	Telephone call w/ J Phelan re: scheduling depositions
3/18/2003	PJS	0.2	Draft letter to V Johnson re: deposition
3/18/2003	PJS	0.2	Draft letter to J Lloyd re: deposition
3/18/2003	PJS	0.3	Research re: D Minetree criminal charges
3/18/2003	PJS	0.4	Draft letter to J Phelan re: supplemental discovery
3/18/2003	PJS	0.4	Conference w/ colleague BG re: discovery matters, including potential motions to compel and/or sanctions, Murray Simpson subpoena, pending depositions
3/18/2003	PJS	0.5	Legal research re: production of income taxes
3/20/2003	PJS	1.8	Legal courthouse research in Baltimore re: David K Minetree
3/20/2003	PJS	6.0	Prepare client J Lloyd for deposition, including travel
3/21/2003	PJS	0.5	Meeting with client M Newsome
3/21/2003	PJS	3.5	Prepare for deposition of J Lloyd, including meeting w/ client, legal research re: class rep adequacy, travel
3/21/2003	PJS	5.0	Deposition of Joseph Lloyd (10-3)
3/22/2003	PJS	7.0	Meeting w/ clients M Newsome and R Curtis re: depositions, including travel
3/24/2003	PJS	0.2	Conference w/ colleague BG re: letter regarding M Simpson
3/24/2003	PJS	0.5	Telephone conference with client R Curtis re: deposition
3/24/2003	PJS	0.6	Legal research re: 5th amendment privilege
3/25/2003	PJS	1.4	Prepare for M Newsome deposition, including statement review and review of time and attendance records; telephone call w/ client re: same
3/26/2003	PJS	1.0	Investigation re: civil litigation records for Minetree and Stair
3/26/2003	PJS	7.0	Defend M Newsome's deposition (10-2:30), prepare witness for deposition, travel time
3/27/2003	PJS	0.2	Telephone call w/ Boris Steffen re: update on economic data
3/27/2003	PJS	0.2	Draft letter to J Phelan re: discovery and depositions
3/27/2003	PJS	1.2	Legal research re: class action withdrawal and tolling; conference w/ colleague BG re: same
3/30/2003	PJS	5.2	Prepare client V Johnson for deposition; review of V Johnson documents regarding deposition
3/31/2003	PJS	0.1	Conference w/ colleague DBH re: Gesner discovery order
3/31/2003	PJS	0.1	Telephone call w/ David Deramus re: billing
3/31/2003	PJS	0.5	Telephone call w/ TMK re: potential witnesses; review information about witnesses from TMK notes
3/31/2003	PJS	1.0	Legal research re: impact of Rule 23(e)

<u>Date</u>	<u>Atty</u>	<u>Hours</u>	<u>Description</u>
3/31/2003	PJS	1.5	Prepare for document review at UTD, including review of personnel files and defendants' discovery responses
3/31/2003	PJS	1.6	Prepare for document review at UTD, including review of personnel files
4/1/2003	PJS	9.0	Review personnel documents at UTD worksite
4/2/2003	PJS	0.1	Telephone call w/ J Phelan re: deposition scheduling and document production
4/2/2003	PJS	0.8	Legal research re: definition of similarly situated employees
4/2/2003	PJS	2.0	Review personnel files copied at UTD on 4/1
4/3/2003	PJS	1.3	Investigation re: court files for Minetrees and N Stair
4/3/2003	PJS	4.7	Defend V Johnson deposition and prepare client for deposition
4/21/2003	PJS	1.8	Compare voucher data to employee schedule reports
4/22/2003	PJS	1.0	Review documents produced in discovery by defendants, including interrogatory answers
4/22/2003	PJS	2.4	Compare voucher data to employee schedule documents
4/24/2003	PJS	0.3	Telephone conference with Celeste Ireland re: case status
4/24/2003	PJS	0.3	Draft letters to clients Newsome, Curtis and Johnson
4/24/2003	PJS	3.0	Statistical and numerical review of voucher data
4/30/2003	PJS	0.2	Prepare for deposition of Brad Minetree
4/30/2003	PJS	0.2	Prepare for deposition of C Weyrich
5/2/2003	PJS	0.1	Draft quarterly fee letter
5/5/2003	PJS	0.2	Conference w/ colleague RAS re: class action status
5/6/2003	PJS	1.2	Legal research re: class certification
5/7/2003	PJS	1.1	Review M Simpson documents produced pursuant to subpoena
5/7/2003	PJS	1.5	Review M. Simpson documents produced in discovery
5/8/2003	PJS	0.2	Telephone call w/ C Mann re: expert report
5/8/2003	PJS	0.4	Legal research re: class certification
5/8/2003	PJS	1.2	Continue review of statistical analysis performed by M Simpson
5/9/2003	PJS	1.1	Meeting re: class action certification
5/9/2003	PJS	1.5	Review Murray Simpson statistical data
5/9/2003	PJS	2.5	Meeting w/ Charles Mann re: supplemental report and Murray Simpson data
5/12/2003	PJS	0.2	Draft notice of deposition for C Weyrich
5/12/2003	PJS	0.2	Draft notice of deposition for B Minetree
5/12/2003	PJS	1.4	Prepare for deposition of C Weyrich, including review of initial deposition of C Weyrich and T Hendrickson
5/12/2003	PJS	1.8	Telephone call w/ C Mann re: supplemental report; review statistical data and Excel database provided by state re: prior work experience; conference w/ colleague DBH re: supplemental report
5/13/2003	PJS	5.5	Prepare for deposition of C Weyrich, including draft of questions, review deposition exhibits, review deposition transcripts for Weyrich, Hendrickson, Stair and B Minetree
5/14/2003	PJS	0.1	Telephone conference with client J Lloyd re: deposition
5/14/2003	PJS	0.5	Review MCHR personnel data re: prior work experience
5/14/2003	PJS	0.5	Prepare for deposition of C Weyrich
5/14/2003	PJS	1.0	Review C Mann expert report
5/14/2003	PJS	3.2	Deposition of C Weyrich
5/15/2003	PJS	0.7	Conference w/ colleague DBH re: Mann supplementary report; telephone call w/ Mann re: supplementary report
5/19/2003	PJS	0.5	Review subpoena for C Mann; confer w/ BG re: same
5/19/2003	PJS	5.0	Prepare for Brad Minetree deposition, including document review, review depositions of B Minetree, T Hendrickson, L Marr, prepare questions
5/20/2003	PJS	7.0	Continue to prepare for deposition of Brad Minetree, including draft questions, review of deposition exhibits, review of depositions of T Hendrickson, B Minetree, C Weyrich
5/21/2003	PJS	1.0	Review subpoena duces tecum; cf. to plaintiffs' subpoena to Murray Simpson
5/21/2003	PJS	1.0	Legal research re: FRCP 26(a) and 45

<u>Date</u>	<u>Atty</u>	<u>Hours</u>	<u>Description</u>
5/21/2003	PJS	1.5	Prepare for deposition of B Minetree
5/21/2003	PJS	10.0	Deposition of Brad Minetree (and travel 3.0 hrs)
5/22/2003	PJS	3.5	Legal research re: FRCP 26 and 45; conference w/ colleague BG re: subpoena; telephone calls w/ C Mann re: same
5/23/2003	PJS	0.5	Edit letter to J Phelan re: subpoena duces tecum; conference w/ colleague BG re: same
5/27/2003	PJS	2.0	Draft class certification brief
5/28/2003	PJS	0.5	Draft status report; conference w/ colleagues RAS, DBH re: same
5/29/2003	PJS	1.3	Edit draft status order; draft proposed order; telephone calls (2) w/ J Phelan re: same; conference w/ colleague BG re: litigation strategy
5/30/2003	PJS	1.2	Review letter to J Phelan re: subpoena to Mann; review Behler v. Hanlon; conference w/ colleague BG re: same
6/3/2003	PJS	0.5	Telephone call w/ C Mann re: subpoena duces tecum
6/3/2003	PJS	0.7	Summarize D Minetree deposition I
6/4/2003	PJS	6.0	Deposition digests for D Minetree II, J Fitzgerald, B Minetree I
6/9/2003	PJS	0.6	Deposition digest for V Johnson
6/10/2003	PJS	0.5	Continue digest of VJ deposition
6/10/2003	PJS	0.5	Continue deposition digest for V Johnson
6/10/2003	PJS	0.6	Review deposition digest for B Minetree, D Minetree, F Berg
6/11/2003	PJS	1.0	Draft class cert motion
6/11/2003	PJS	2.0	Continue digest of V Johnson, M Newsome and J Fitzgerald depositions
6/12/2003	PJS	0.5	Continue digest of Melvin Newsome deposition
6/12/2003	PJS	0.8	Continue deposition digest for M Newsome
6/13/2003	PJS	0.3	Digest of Joseph Lloyd deposition
6/16/2003	PJS	1.0	Draft C. Uhler-Ford statement; legal research re: 803(8); conference w/ colleague DBH re: same
6/16/2003	PJS	2.0	Draft statement of facts
6/17/2003	PJS	2.0	Draft statement of facts
6/18/2003	PJS	4.0	Draft Farragher/Ellerth hostile work environment facts; legal research
6/18/2003	PJS	6.0	Continue drafting statement of facts re: motion for class certification
6/19/2003	PJS	1.5	Legal research re: 4th Circuit hostile work environment
6/19/2003	PJS	2.4	Legal research re: statistical evidence
6/19/2003	PJS	3.5	Review motion for class certification
6/20/2003	PJS	2.0	Legal research re: 23(b)(3) and statistical evidence
6/23/2003	PJS	2.5	Legal research re: 23(b)(3) class actions; and circuit split re: class actions; statistical evidence; standard for racial harassment in Md. D. Ct.
6/24/2003	PJS	2.0	Continue review and preparation of deposition exhibits for electronic filing
6/24/2003	PJS	7.0	Continue to prepare motion for class certification, including legal research re: Rule 23 standards for reviewing allegations in complaint; legal research re: FRE 803(8), prepare exhibits; draft notice of lengthy pleading and certificate of service; review MCHR findings; conference w/ colleague DBH re: same
6/25/2003	PJS	6.5	Continue to prepare class certification motion, including edit and fact check brief, conferences w/ colleague DBH re: same, review and prepare deposition testimony and exhibits
6/26/2003	PJS	5.0	Prepare motion for class certification for filing, including edit and fact check of motion, telephone call w/ client Rudolph Curtis, draft letter to court, review of electronic filing procedures and electronic filing
6/27/2003	PJS	3.0	Read and begin draft of opposition to motion for summary judgment
7/6/2003	PJS	10.0	Draft opposition to motion for summary judgment
7/7/2003	PJS	4.0	Continue draft of opposition to motion for summary judgment
7/8/2003	PJS	8.0	Draft opposition to motion for summary judgment
7/9/2003	PJS	3.0	hostile work environment, FRCP 56

<u>Date</u>	<u>Atty</u>	<u>Hours</u>	<u>Description</u>
7/10/2003	PJS	7.0	Continue draft of opposition to motion for summary judgment, including legal research re: direct evidence, conference w/ colleague BG re: opposition
7/11/2003	PJS	2.4	Edit opposition to motion for summary judgment; legal research re: Harris hostile work environment standard and review of deposition testimony
7/14/2003	PJS	1.0	Legal research re: NLRB complain admissibility re: FRE 803(8)
7/14/2003	PJS	1.5	Draft opposition for motion for summary judgment re: review of Newsome deposition, Datcher deposition, NLRB complaint
7/14/2003	PJS	2.0	Continue revision of opposition to motion for summary judgment, including conference w/ colleague RAS
7/15/2003	PJS	1.5	Draft statement of disputed facts
7/15/2003	PJS	3.5	Continue draft statement of genuine issues
7/16/2003	PJS	0.8	Conference w/ colleague DBH re: opposition to motion for summary judgment; continue edit of opposition
7/16/2003	PJS	2.0	Review statement of disputed facts
7/17/2003	PJS	6.0	Edit opposition to motion for summary judgment
7/18/2003	PJS	4.0	Edit opposition to motion for summary judgment and statement of genuine issues
7/20/2003	PJS	2.1	Edit opposition to motion for summary judgment and prepare Adobe documents
7/22/2003	PJS	0.2	Draft letter to clients and court
7/22/2003	PJS	0.3	Legal research re: Rule 803(8) and FRCP 23
7/22/2003	PJS	1.0	Review defendants' opposition to class certification
7/22/2003	PJS	5.0	Edit opposition to motion for summary judgment and genuine issues of disputed facts; electronic filing
7/23/2003	PJS	0.5	Legal research re: statute of limitations for 1981 claims
7/25/2003	PJS	2.5	Legal research re: defendants' opposition to class certification, including statistical evidence, FRE 803(8), harassment classes certified, and commonality
7/29/2003	PJS	0.4	Review scheduling orders for reply to opposition to motion for class certification
7/31/2003	PJS	2.5	Reply to opposition to class certification, analysis of year 2000 MCHR database
8/3/2003	PJS	2.0	Edit reply brief
8/4/2003	PJS	5.5	Edit reply brief, including legal research re: defendants' burden of proof in opposition to class certification, compensatory damages in class actions, 3rd party evidence, D.Md. class action cases and harassment class actions
9/17/2003	PJS	0.1	Telephone call w/ AJ chambers re: conference call; msg for J Phelan re: same
9/17/2003	PJS	0.5	Review MCHR brief
9/23/2003	PJS	0.1	Draft e-mail to J Phelan re: conf.; msg for Judge Brady re: same
9/30/2003	PJS	0.5	Telephone call w/ Lee Hoshall re: UTD administrative litigation; draft e-mail
10/1/2003	PJS	0.2	Telephone call w/ Lee Hoshall re: hearing
10/1/2003	PJS	0.4	Teleconference w/ Judge Brady re: administrative claims
10/1/2003	PJS	0.4	Conference w/ colleague BG re: hearing
10/16/2003	PJS	1.0	Review documents; conference w/ colleague BG, DBH
10/21/2003	PJS	0.2	Conference w/ colleague BG re: oral argument
10/21/2003	PJS	0.2	Draft letter to J Phelan re: 3rd Q fees
10/22/2003	PJS	1.2	Legal research re: recent 4th Circuit class action decisions
10/27/2003	PJS	3.4	Edit motion to stay; review pleadings & letters filed by parties and AJ; conference w/ colleague BG re: same
10/28/2003	PJS	2.0	Draft motion to stay and file with Court; conference w/ colleague BG re: same
10/31/2003	PJS	0.8	Legal research re: KB Toys decision by J. Chasanow
11/10/2003	PJS	0.4	Conference w/ colleague BG re: administrative hearing, pro hac vice
11/10/2003	PJS	1.7	Prepare for oral argument, including legal research on class actions in 4th Circuit

<u>Date</u>	<u>Atty</u>	<u>Hours</u>	<u>Description</u>
11/11/2003	PJS	6.5	Prepare for USDC oral argument; confer w/ DBH re: same
11/12/2003	PJS	2.0	Moot court re: oral argument
11/12/2003	PJS	3.0	Prepare for oral argument
11/13/2003	PJS	3.5	Prepare for oral argument
11/13/2003	PJS	2.0	Oral argument in USDC Md.; travel time (1.0)
11/18/2003	PJS	0.3	Locate and review collective bargaining agreement
11/20/2003	PJS	0.3	Review filing from UTD re: collective bargaining agreement
11/25/2003	PJS	0.1	Review letters to Judge Brady
12/3/2003	PJS	0.4	Conference w/ colleague BG, RAS re: administrative hearing
12/4/2003	PJS	0.3	Telephone call w/ Judge Brady re: scheduling; conference w/colleague BG re: same
1/8/2004	PJS	1.2	Legal research re: attorney fees for administrative hearing
1/9/2004	PJS	2.7	Legal research re: attorney fees for MCHR hearing
1/14/2004	PJS	0.5	Status teleconference with Judge Brady re: MCHR hearing; conference w/ colleague BG re: same
1/14/2004	PJS	1.1	Legal research re: MD Rule of Prof Responsibility 7.3
1/16/2004	PJS	0.2	Review status report from Judge Brady; review letter from J Phelan re: case status
1/23/2004	PJS	0.5	Review Judge Quarles decision
1/23/2004	PJS	0.9	Telephone conference with clients H Datcher, V Johnson, and M Newsome re: Judge Quarles decision and order
1/26/2004	PJS	0.1	Conference w/ colleague BG re: letter to Judge Brady
1/26/2004	PJS	0.3	Telephone conference with client R Curtis re: decision and order
1/27/2004	PJS	0.8	Draft letter to Jeanne Phelan re: discovery; review discovery documents
1/30/2004	PJS	0.1	Conference w/ colleague BG re: conference w/ Judge Quarles
2/2/2004	PJS	0.2	Conference w/ colleague BG re: mediators
2/3/2004	PJS	0.2	Conference w/ colleague RAS re: preparation for mediation
2/3/2004	PJS	0.3	Telephone call w/ A. Wheatley re: case status
2/3/2004	PJS	0.3	Telephone call w/ Boris Steffen re: preparation for mediation
2/5/2004	PJS	0.7	Conferences (sep.) w/ colleagues BG, DBH re: discovery conference w/ Judge Quarles
2/5/2004	PJS	1.5	Legal research re: class settlement issues
2/6/2004	PJS	0.3	Discovery telephone conference w/ Judge Quarles
2/6/2004	PJS	0.4	Prepare for discovery conference with Judge Quarles, including conference w/ colleague BG
2/6/2004	PJS	0.5	Prepare for discovery conference
2/6/2004	PJS	0.7	Review of employee databases to calculate monetary damages
2/6/2004	PJS	0.7	Prepare for discovery conference, including conference w/ colleague BG
2/6/2004	PJS	1.7	Review discovery documents and depositions of Weyrich and Minetree to prepare for mediation
2/8/2004	PJS	0.5	Review depositions of Weyrich and Minetree to prepare for meeting w/ Boris Steffen
2/8/2004	PJS	0.5	Draft letter to Jeanne Phelan re: discovery supplement
2/9/2004	PJS	0.2	Conference w/ colleague BG re: scheduled administrative settlement hearing
2/9/2004	PJS	0.3	Telephone conference with client C. Ireland re: class action and administrative hearing
2/9/2004	PJS	0.3	Mediation, conference w/ colleague BG re: union contract
2/9/2004	PJS	0.4	Discovery & Mediation, draft letter to J. Phelan re: financial statements
2/9/2004	PJS	0.5	Discovery & Mediation, review UTD financial documents and depositions to prepare for meeting w/ B. Steffen
2/10/2004	PJS	0.2	Conference w/ colleague BG re: notice to clients of settlement conference; msg re: same for Arlene Black

<u>Date</u>	<u>Atty</u>	<u>Hours</u>	<u>Description</u>
2/11/2004	PJS	0.2	Case administration and mediation: Telephone conference with client re: discovery, mediation
2/11/2004	PJS	0.5	Draft letter to AJ Brady re: Celeste Ireland; telephone conference with client C Ireland re: settlement conference; e-mail to J Phelan re: same; msg for L Hoshall re: same
2/11/2004	PJS	2.0	Mediation, meeting w/ expert Boris Steffen re: UTD financial data; prepare for meeting
2/13/2004	PJS	0.2	Review Judge Brady decision re: stay
2/13/2004	PJS	0.2	Draft letter to Judge Brady re: Celeste Ireland
2/19/2004	PJS	0.1	Telephone conference with client H Datcher re: mediation
2/27/2004	PJS	0.3	Settlement conference, telephone conference with opposing counsel J Phelan re: settlement conference; telephone call w/ Judge Gauvey's clerk re: moving settlement conference forward
3/2/2004	PJS	0.2	Telephone call w/ expert B Steffen re: obtaining updated financial documents
3/3/2004	PJS	0.2	Legal research re: class action settlements
3/4/2004	PJS	0.4	ADR, draft letter to class representatives
3/4/2004	PJS	0.4	ADR, draft letter to EEOC clients
3/5/2004	PJS	0.1	ADR, review order from Judge Gauvey re: settlement
3/5/2004	PJS	0.3	Discovery, draft e-mail to J Phelan re: financial documents
3/5/2004	PJS	0.5	ADR, conference w/ colleague RAS re: structuring settlement
3/5/2004	PJS	0.9	ADR, draft letter re: settlement to Judge Gauvey; conference w/ colleagues RAS, DBH re: same
3/5/2004	PJS	1.0	Draft settlement proposal
3/8/2004	PJS	0.2	ADR, conference w/ colleague DBH re: settlement letters to Judge Gauvey & defendants
3/8/2004	PJS	0.4	ADR, discovery: review UTD 2003 financial statement
3/8/2004	PJS	0.4	ADR, telephone conferences with client J Lloyd and R Curtis re: settlement
3/8/2004	PJS	0.5	ADR, draft demand letter to opposing counsel
3/8/2004	PJS	0.8	ADR, draft demand letter
3/9/2004	PJS	0.4	Telephone conference with clients R Curtis and M Newsome re: settlement
3/9/2004	PJS	0.4	ADR, telephone conference with client H Datcher re: settlement proposal
3/9/2004	PJS	0.5	ADR, draft demand letter to opposing counsel
3/9/2004	PJS	0.5	Meeting w/ RAS, DBH re: settlement offer
3/10/2004	PJS	0.2	ADR, edit settlement letters to Judge and opposing counsel
3/10/2004	PJS	0.4	ADR, review demand letters; conference w/ colleague RAS, DBH
3/13/2004	PJS	0.5	Preparation for settlement conference
3/15/2004	PJS	0.2	Telephone call w/ expert B Steffen re: mediation
3/19/2004	PJS	0.3	Conference w/ colleague BG re: punitive damages
3/19/2004	PJS	0.5	Ireland, review settlement agreement
3/22/2004	PJS	0.5	ADR, conference w/ colleague DBH, RAS re: bankruptcy, legal research re: same
3/26/2004	PJS	0.5	Meeting w/ Linda Correia re: bankruptcy
3/28/2004	PJS	0.4	Telephone calls w/ clients, Newsome, Lloyd, Curtis re: settlement
3/29/2004	PJS	0.7	ADR, telephone call w/ Boris Steffen re: UTD finances, conference w/ colleague RAS
3/30/2004	PJS	0.5	ADR, review Excel spreadsheet to determine hours worked by blacks
3/30/2004	PJS	0.5	ADR, meeting w/ DBH, RAS, BG re: settlement
3/31/2004	PJS	0.5	ADR, meeting w/ clients re: preparation for settlement conference
3/31/2004	PJS	14.5	ADR, settlement conference with Judge Gauvey 9:30 to 9:00 (and travel time 3.0)
4/1/2004	PJS	0.4	Review Pasquale Hernandez documents and MCHR probable cause finding
4/2/2004	PJS	2.5	Consolidate 1998 and 1999 excel spreadsheets
4/15/2004	PJS	1.7	Meeting w/ DBH, RAS, BG re: consent decree and settlement agreement

<u>Date</u>	<u>Atty</u>	<u>Hours</u>	<u>Description</u>
4/19/2004	PJS	0.5	Telephone call w/ SSI, Mark Patton
4/19/2004	PJS	6.5	Review and edit consent decree; legal research re: common fund attorney fees; conference w/ colleague DBH re: consent decree
4/21/2004	PJS	3.5	Review and edit consent decree; draft letter to J Phelan re: consent decree; e-mails to L Correia and L Hoshall re: same; conference w/ colleague DBH re: consent decree
4/26/2004	PJS	0.2	Review bankruptcy issues re: consent decree (L Correia)
4/28/2004	PJS	0.3	Telephone call w/ David Deramus re: costs of Boris Steffen
4/28/2004	PJS	2.0	Conference re: proposed settlement agreement
5/5/2004	PJS	0.2	ADR, draft e-mail to Lee Hoshall re: consent decree
5/6/2004	PJS	0.2	Review e-mail from Lee Hoshall
5/13/2004	PJS	0.3	Motions practice, draft extension of time and order
5/26/2004	PJS	3.5	Settlement, revise Consent Decree; conference w/ colleague DBH re: same; draft letter to J Phelan re: Consent Decree; telephone call w/ L Correia
6/7/2004	PJS	2.5	Settlement, discussions with DBH, RAS re: settlement; telephone conference with opposing counsel (2) re: same
6/9/2004	PJS	5.0	Settlement, draft consent decree, motion to seal and order; conference w/ colleague DBH re: same; e-mails with J Phelan re: same
6/10/2004	PJS	1.0	Settlement, begin review of Paychex payroll records 2000-2004
6/10/2004	PJS	1.5	Settlement, review J Phelan edits to pleadings; draft e-mail to J Phelan re: edits; draft final changes to consent decree, file consent decree pleadings with Court; conference w/ colleague DBH re: same
6/11/2004	PJS	4.0	Consent decree, review UTD Paychex records to send to SSI; draft letter to M Patton, SSI
6/14/2004	PJS	6.5	Consent decree, review Paychex records and UTD computer data to create class member database
6/15/2004	PJS	7.0	Settlement, review Paychex records and UTD computer database to create class member database
6/16/2004	PJS	5.5	Consent decree, continue review of UTD Paychex documents and electronic records in order to create Class Member database for SSI
6/17/2004	PJS	2.5	Consent decree, continue review of Paychex documents and UTD electronic records; send documents and Excel file to SSI
6/25/2004	PJS	0.3	Conference w/ colleague DBH re: consent decree
6/25/2004	PJS	0.3	Telephone call w/ Mark Patton re: creation of UTD class member database
7/9/2004	PJS	0.5	Consent decree, draft memos to Mark Patton re: notice
Subtotal		1,112.9	
6/12/2001	RAS	2.0	Meet with potential class agents
6/22/2001	RAS	1.5	Review materials from Maryland Commission on Human Rights in prep for complaint
7/3/2001	RAS	1.5	Review draft complaint, revise
7/18/2001	RAS	1.5	Review and revise complaint, confer with PJS re: complaint filing and media
7/30/2001	RAS	0.5	Review press release, complaint
1/2/2002	RAS	1.5	Review protective agreement and defendants' first discovery responses; meet with PJS re: discovery issues
1/14/2002	RAS	1.5	Review discovery provided by Maryland state
1/28/2002	RAS	3.5	Prepare for and attend meeting with accountants and opposition re settlement
8/6/2002	RAS	2.0	Research into precertification notice of dismissal
11/18/2002	RAS	0.4	Review expert report, meet with DBH and PJS re: report
1/27/2003	RAS	0.7	Review discovery responses
3/25/2003	RAS	6.0	Prepare for and defend Curtis deposition
4/1/2003	RAS	0.5	Review memorandum on dismissing class claim, pursuing individual claims.
4/3/2003	RAS	0.4	Meeting with PJS re research on dismissing class claims

<u>Date</u>	<u>Attv</u>	<u>Hours</u>	<u>Description</u>
4/4/2003	RAS	3.0	Research into comp and punitive damages in class claims
4/24/2003	RAS	2.0	research into class issues; class hostile work environment claims, applicability of Campbell Supreme Court decision on punitive damages to class, and class punitive damages claims in general
4/25/2003	RAS	2.0	Research into class action; compensatory and punitive damages and hostile work environment effect on class certification, tolling of individual claims and what happens if we voluntarily dismiss class under Rule 23(e)
5/6/2003	RAS	3.0	Research into tolling and Rule 23, what happens if dismissal is voluntary as opposed to cert denied
5/9/2003	RAS	2.0	Research; prepare for meeting on class action/tolling issues
6/2/2003	RAS	1.0	Review and digest Curtis deposition
6/3/2003	RAS	1.0	Review and digest Curtis deposition
6/5/2003	RAS	2.7	Review and digest Stair deposition
6/9/2003	RAS	3.5	Digest Curtis depo, digest Stair depo
11/12/2003	RAS	2.5	Prepare for moot re class cert; prepare for Maryland state prehearing conference
11/13/2003	RAS	3.5	Trip to Maryland State Commission hearing on administrative claims; motion to stay and consolidation
1/23/2004	RAS	0.5	Review decision on class certification motion
2/3/2004	RAS	0.3	Meeting with Phil, letter to clients re case update
2/4/2004	RAS	1.0	Draft letter to class members
3/9/2004	RAS	1.2	Meeting with PJS and DBH re upcoming mediation
3/10/2004	RAS	0.5	Review and revise settlement letters; meeting with DBH and PJS re mediation
3/17/2004	RAS	0.3	Call to Jonathon Puth re bankruptcy issues
3/22/2004	RAS	0.8	Confer with Linda Correia re bankruptcy issues in advance of mediation; meet with PJS and DBH re: Correia discussion
3/23/2004	RAS	4.0	Research into bankruptcy "bad faith" issues under Ch 11 in preparation for the mediation
3/26/2004	RAS	1.5	Meeting with Linda Correia, PJS, BNG and DBH re: upcoming mediation and bankruptcy issues
3/29/2004	RAS	0.4	Conference call with Boris Stefan re: upcoming mediation and defendants' financial status
3/30/2004	RAS	1.0	Prepare for mediation
3/31/2004	RAS	10.0	Mediation
4/12/2004	RAS	1.0	Meeting with PJS to discuss consent decree issues
4/15/2004	RAS	1.7	Meeting with DBH, PJS and BNG on consent decree issues
6/1/2004	RAS	1.2	Meeting with PJS and DBH re: consent decree issues, letter to J Phelan re same
6/2/2004	RAS	0.3	Letter to J Phelan
6/3/2004	RAS	0.3	Meeting with PJS re settlement issues
6/4/2004	RAS	1.0	Settlement discussions
Subtotal		76.7	
6/6/2001	DBH	1.5	Review retainer
9/12/2001	DBH	2.0	Research re: class certification
9/13/2001	DBH	0.5	Research re: class certification
9/18/2001	DBH	1.2	Research re: class certification
10/16/2001	DBH	2.0	Conference w/ Dr. C. Mann re: statistical analysis
10/24/2001	DBH	1.0	Review discovery requests
1/28/2002	DBH	4.0	Meeting w/ L. Wolf, J. Phelan and C. Weyrich re: financial condition of defendant
5/21/2002	DBH	0.8	Conference w/ Boris Steffen re: financial analysis of defendant
7/23/2002	DBH	1.2	Meeting with Dr. C. Mann re: statistical analysis
11/6/2002	DBH	0.8	Review motion re: revising schedule
11/18/2002	DBH	1.2	Review Dr. Mann's draft report; telephone call w/ Dr. Mann re: report

<u>Date</u>	<u>Atty</u>	<u>Hours</u>	<u>Description</u>
11/20/2002	DBH	0.7	Review Dr. Mann's analysis
11/21/2002	DBH	1.2	Review Dr. Mann's revised report; telephone call w/ P. Simon re: report
11/22/2002	DBH	1.0	Review Dr. Mann's report; telephone call w/ M. Dunbar
12/10/2002	DBH	0.5	Review motion to compel
12/18/2002	DBH	0.4	Conference w/ P. Simon re: discovery
2/13/2003	DBH	0.5	conference w/ P. Simon re: discovery
2/14/2003	DBH	3.0	Research re: class cert.
3/4/2003	DBH	1.7	Review report from M. Simpson; conference w/ P. Simon re report
3/12/2003	DBH	0.7	Review opposition to motion to exceed discovery limits
5/9/2003	DBH	1.5	Conference w/ colleagues re: class cert.
5/15/2003	DBH	0.7	Review C. Mann report
5/30/2003	DBH	1.2	Draft motion for class cert.
6/5/2003	DBH	3.2	Draft motion for class cert.
6/6/2003	DBH	2.7	Draft motion for class cert.
6/9/2003	DBH	0.8	Research re: class cert.
6/10/2003	DBH	2.4	Research re: class cert.
6/11/2003	DBH	2.2	Research re: class cert.
6/12/2003	DBH	1.7	Research re: class cert.
6/14/2003	DBH	6.5	Draft motion for class cert.
6/15/2003	DBH	4.2	Draft motion for class cert.
6/16/2003	DBH	6.4	Draft motion for class cert.
6/17/2003	DBH	2.2	Draft motion for class cert.
6/18/2003	DBH	5.3	Draft motion for class cert.
6/19/2003	DBH	2.0	Review motion for class cert.
6/24/2003	DBH	6.7	Revise motion for class cert.
6/25/2003	DBH	6.2	Revise motion for class cert.; draft declaration re: adequacy of representation
7/1/2003	DBH	1.0	Review UTD motion for summary judgment
7/15/2003	DBH	0.5	Review opposition to summary judgment
7/16/2003	DBH	2.8	Review opposition to summary judgment
7/18/2003	DBH	0.7	Review statement of genuine issues
7/22/2003	DBH	0.7	Review defendants' opposition to class cert.
7/29/2003	DBH	3.5	Draft class cert. reply
7/30/2003	DBH	3.7	Draft class cert. reply
7/31/2003	DBH	7.7	Draft class cert. reply
8/1/2003	DBH	5.0	Review class cert. reply
8/4/2003	DBH	1.7	Review class cert. reply
11/10/2003	DBH	0.6	Research re: class cert.
11/11/2003	DBH	2.3	Prepare for argument on class certification
11/12/2003	DBH	2.7	Prepare for argument on class certification
11/13/2003	DBH	3.2	Prepare for and attend argument on class certification
1/23/2004	DBH	0.8	Review decision on class cert.
3/5/2004	DBH	0.3	Conference w/ P. Simon and R. Salzman re: settlement
3/9/2004	DBH	5.4	Review materials re settlement; conference w/ P. Simon and R. Salzman re: settlement (2.4); revise settlement letters to Judge Gauvey and J. Phelan (3.0)
3/10/2004	DBH	1.3	Revise settlement letters to Judge Gauvey and J. Phelan
3/26/2004	DBH	1.3	Conference w/ L. Correia re: bankruptcy issues in settlement
3/31/2004	DBH	0.6	Telephone call w/R. Salzman re: settlement
4/7/2004	DBH	3.5	Draft consent decree
4/8/2004	DBH	3.4	Draft consent decree
4/9/2004	DBH	3.3	Draft consent decree
4/11/2004	DBH	1.8	Draft consent decree
4/12/2004	DBH	2.2	Draft consent decree
4/15/2004	DBH	3.0	Review consent decree; conference w/ P. Simon, R. Salzman and B. Grdina re consent decree

<u>Date</u>	<u>Atty</u>	<u>Hours</u>	<u>Description</u>
4/17/2004	DBH	1.5	Revise consent decree
4/18/2004	DBH	1.5	Revise consent decree
4/19/2004	DBH	2.3	Conference w/ P. Simon re: consent decree; revise consent decree
4/21/2004	DBH	6.3	Revise consent decree
4/23/2004	DBH	1.8	Revise consent decree and formula
4/30/2004	DBH	0.8	Revise consent decree
5/11/2004	DBH	0.5	Review defendants' changes in consent decree
5/25/2004	DBH	1.3	Review defendants' proposed changes to consent decree; conference w/ P. Simon re: same
5/26/2004	DBH	0.5	Review letter to J. Phelan re: changes in Consent Decree
5/28/2004	DBH	1.3	Review defendants' position on changes to Consent Decree
6/4/2004	DBH	2.2	Final negotiations
6/7/2004	DBH	4.5	Final negotiations
6/8/2004	DBH	5.0	Final drafting
6/9/2004	DBH	2.5	Final drafting and reviewing
6/18/2004	DBH	7.0	Draft notice to class and related materials
6/29/2004	DBH	1.2	Draft joint motion to approve notice to class
7/28/2004	DBH	1.2	E-mail to M. Patton re: responding to inquiries from class members
8/4/2004	DBH	1.2	Develop instructions re: responding to inquiries from class members
9/15/2004	DBH	0.4	Draft letter to J. Phelan re: opt out notices
10/14/2004	DBH	3.2	Draft email re: allocation; conference w/ T. Kramer re brief (11/10)
10/15/2004	DBH	0.7	Revise memo re: allocation of settlement proceeds
10/19/2004	DBH	0.4	Review M. Patton's questions re: allocation of damages
Subtotal		192.1	
1/10/2003	BG	2.5	Review files, prepare to draft responses to doc requests
1/13/2003	BG	4.0	Draft answers to Datcher interros
1/14/2003	BG	2.0	Attend Dave Minetree deposition
1/14/2003	BG	4.0	answer Datcher interros; answer Datcher doc requests; conf with PJS re: same
1/17/2003	BG	8.0	Draft answers to discovery: Datcher, Newsome, Lloyd
1/20/2003	BG	2.5	Revise document requests responses for Datcher, Newsome, Lloyd, serve on opposing counsel
1/22/2003	BG	5.0	Draft interrog. answers for Newsome and Johnson
1/23/2003	BG	2.0	Draft Johnson, Curtis document requests responses
1/23/2003	BG	2.0	Draft brief/letter to Mag. Judge re: Rule 30(b)(6) deposition dispute
1/23/2003	BG	3.0	Revise, edit Curtis and Johnson document requests responses; draft Datcher interrog. answers
1/23/2003	BG	3.5	Prepare for discovery dispute oral argument; draft supplemental letter to Judge Gesner; conf call with Court on discovery dispute; draft deposition scheduling letter to Phelan
1/27/2003	BG	8.0	Revise answers to Johnson interros; draft answers to Newsome interros
1/28/2003	BG	0.3	Draft discovery letter to Phelan
1/28/2003	BG	4.0	Draft answers to Curtis interros
1/29/2003	BG	0.5	Draft letter to Phelan re: 30(b)(6) deposition and doc production
1/29/2003	BG	0.8	Conf with PJS re discovery dispute w/ Phelan
1/30/2003	BG	1.5	Review Phelan discovery correspondence; redraft Wyler subpoena attachment A; review discovery issues with PJS
1/31/2003	BG	0.3	Tel conf with Phelan and PJS re: scheduling deposition of Brad Minetree; doc production
1/31/2003	BG	0.5	Revise document subpoena for accounting firm; tel conf with PJS re: same
2/4/2003	BG	2.0	Draft responses to doc requests
2/5/2003	BG	2.0	Travel to Baltimore for Stair depo
2/5/2003	BG	7.3	Attend Nancy Stair depo

<u>Date</u>	<u>Atty</u>	<u>Hours</u>	<u>Description</u>
2/10/2003	BG	0.3	Draft notice of appearance
2/12/2003	BG	1.0	Draft motion for leave to exceed discovery limits
2/12/2003	BG	3.7	Draft plaintiffs' sixth discovery request; draft letter to Phelan re: amended notice of deposition
2/13/2003	BG	2.0	Travel to Baltimore for Minetree deposition
2/13/2003	BG	7.8	Attend Brad Minetree deposition
2/14/2003	BG	2.0	Draft requests for admissions
2/19/2003	BG	1.0	Conf with PJS re: outstanding discovery issues
2/19/2003	BG	2.0	Draft Moniodis document request
2/20/2003	BG	1.2	Draft depo notices for Moniodis and Betten depositions; draft Betten doc subpoena; tel conf with Phelan re: discovery issues; conf with PJS re discovery issues
2/21/2003	BG	2.2	Tel conf with Phelan re depositions; revise motion for leave to exceed discovery limits
2/22/2003	BG	3.0	Legal research; revise motion for leave to exceed discovery limits
2/24/2003	BG	0.8	Conf with PJS re: motion for leave to exceed discovery limits
2/25/2003	BG	2.6	Draft Simpson subpoena (doc production); tel conf with Phelan; review PJS' draft of motion to exceed
2/26/2003	BG	2.6	Tel conf with Phelan re: depo dates; draft letter to Phelan re depositions; draft Hendrickson depo notice; draft Stair depo notice
2/27/2003	BG	0.1	Tel conf with Carl Gold re: David Minetree depo
3/4/2003	BG	0.1	Review consent motion to extend discovery
3/5/2003	BG	0.3	Conf with PJS re: expert's statistical analysis
3/5/2003	BG	0.3	Draft letter to Phelan re: doc production
3/5/2003	BG	0.3	Tel conf with Moniodis
3/6/2003	BG	0.6	Review Phelan letter re: deposition schedule; conf with PJS re: deposition schedule and discovery; email to Phelan re: deposition schedule issues
3/7/2003	BG	0.5	Prep for Linda Marr deposition
3/7/2003	BG	0.5	Draft discovery, document production letter to Phelan
3/10/2003	BG	2.5	Prep for Linda Marr deposition; tel conf with PJS; email to Phelan re: change of schedule for Marr
3/11/2003	BG	2.0	Travel to and from Towson for Marr deposition
3/11/2003	BG	4.0	Take Linda Marr deposition
3/12/2003	BG	1.3	Tel conf with Moniodis re: chg deposition date; draft letter trial preparation Moniodis; receipt and review Phelan letter re: depositions; tel conf with Alan Betten re: doc subpoena; review reply brief in support of motion to exceed discovery limits
3/13/2003	BG	2.0	Travel to and from Baltimore for Datcher deposition
3/13/2003	BG	7.0	Defend Datcher deposition
3/14/2003	BG	9.3	Prepare for Hendrickson deposition; tel conf with Phelan re: deposition schedule; draft letter to Phelan re deposition schedule
3/15/2003	BG	1.5	Prepare for Hendrickson deposition
3/15/2003	BG	2.0	Legal research - accountant client privilege
3/16/2003	BG	2.5	Prepare for Hendrickson deposition
3/17/2003	BG	1.5	Attend Nancy Stair deposition
3/17/2003	BG	2.0	Travel to and from Baltimore for Hendrickson deposition
3/17/2003	BG	7.0	Take Hendrickson deposition
3/18/2003	BG	0.5	Legal research, adequacy of class rep issues
3/18/2003	BG	0.5	Tel conf with Gretchen Ewalt re: enforcing Simpson subpoena
3/18/2003	BG	2.3	Draft letter to Ewalt re: Simpson subpoena; legal research subpoena enforcement in North Carolina
3/19/2003	BG	0.1	Tel conf with atty for Murray Simpson re: doc production
3/19/2003	BG	0.5	Legal research adequacy of class rep
3/19/2003	BG	1.0	Draft letter to Phelan re: discovery issues

<u>Date</u>	<u>Atty</u>	<u>Hours</u>	<u>Description</u>
3/20/2003	BG	4.5	Legal research: reenforcing Simpson subpoena; tel conf with Simpson's atty; re-draft subpoena, draft cover letter; reserve subpoena to Simpson's atty
3/21/2003	BG	0.7	Review letter from Simpson's atty re: prod of documents; draft response
3/24/2003	BG	0.8	Review confidentiality order; revise response to Simpson's atty
3/24/2003	BG	1.0	Legal research class issues -- tolling, stat limitations, notice to class members
3/25/2003	BG	0.3	Review magistrate decision re: discovery dispute; review time limits for appeal
3/25/2003	BG	0.4	Draft notice of issuance of subpoena of Simpson, fax to Phelan; draft letter to Phelan re: protective order stipulation extending to Simpson docs
3/25/2003	BG	1.0	Review fax from Simpson's atty re: protective order; draft stipulation extending prot order to Simpson documents; draft letter to Phelan re: stip; tel conf with PJS re: same
3/25/2003	BG	6.0	Legal research class issues -- tolling, stat limitations, notice to class members
3/26/2003	BG	0.3	Review email from Phelan re: stipulation of confid order to Simpson documents; file stip with court
3/26/2003	BG	0.5	Review email from Phelan re: stipulation of confid order to Simpson documents; file stip with court; draft letter to Simpson atty re: stip was filed with court
3/26/2003	BG	6.5	Legal research - class action tolling, limitations, notice to class members
3/27/2003	BG	0.3	Conf with PJS re: legal issues affecting class
3/28/2003	BG	0.2	Tel conf with Simpson atty re: doc prod
3/28/2003	BG	0.3	Draft letter to Linda Marr re: signature on deposition
3/28/2003	BG	0.6	Review court order re: reassignment of case to Judge Quarles; conf with PJS re: same
4/1/2003	BG	1.0	Review Simpson doc production
4/2/2003	BG	0.3	Tel conf with Simpson atty re: missing doc production
4/2/2003	BG	1.0	Legal research Rule 23(e) issues; conf with PJS re: same
4/3/2003	BG	0.5	Review Simpson privilege log; review remaining doc production
4/3/2003	BG	3.5	Draft Moniodis deposition outline
4/4/2003	BG	2.3	Prep for Moniodis deposition; conf with PJS re Moniodis outline
4/8/2003	BG	2.5	Prep for Moniodis deposition
4/9/2003	BG	2.4	Travel to and from Towson for Moniodis deposition
4/9/2003	BG	3.0	Prep for and take Moniodis deposition
4/10/2003	BG	0.1	Tel conf with Phelan re: motion to extend scheduling deadlines
4/11/2003	BG	0.4	Revise demand for outstanding discovery letter to Phelan, fax to Phelan
4/11/2003	BG	0.5	Legal research - class settlement, notice, issues
4/11/2003	BG	1.0	Revise motion to extend scheduling deadlines, file with court
4/14/2003	BG	0.1	Review court order granting scheduling extension
4/17/2003	BG	0.3	Review email from Phelan, forwarding electronic versions of employee seniority list and other employee lists
4/25/2003	BG	3.0	Review and organize Simpson document production
5/2/2003	BG	0.3	Tel conf with Mary Anne Sedey's partner re: Murray Simpson as expert
5/6/2003	BG	0.5	Review legal research, Rule 23 issues
5/9/2003	BG	0.3	Conf with PJS re: Simpson documents and issues
5/9/2003	BG	1.5	Conf with PJS, RAS and DBH re class cert issues
5/14/2003	BG	2.5	Attend depo of Carroll Weyrich
5/16/2003	BG	1.0	Review Mann supplemental report
5/16/2003	BG	1.0	Conf with PJS re: Murray Simpson
5/19/2003	BG	1.0	Review Mann subpoena, conf with PJS, review objections
5/19/2003	BG	1.5	Digest Linda Marr deposition in preparation for Brad Minetree deposition
5/20/2003	BG	0.4	Conf with PJS re: prep for Brad Minetree deposition
5/21/2003	BG	9.0	Travel to and from Towson for Brad Minetree deposition; attend Brad Minetree deposition

<u>Date</u>	<u>Atty</u>	<u>Hours</u>	<u>Description</u>
5/22/2003	BG	3.0	Conf with PJS re: Mann subpoena, legal research; draft preliminary objections to Mann subpoena
5/23/2003	BG	2.4	Draft, revise and edit preliminary objections to Mann subpoena; tel conf with Gary Kohlman re: litigation issues
5/29/2003	BG	0.5	Conf with PJS re: discovery issues; review status report
5/30/2003	BG	6.0	Draft supplemental objections letter to subpoena for Charles Mann
6/3/2003	BG	0.5	Tel conf w/ Charles Mann re: subpoenaed documents
6/4/2003	BG	1.5	Complete Linda Marr deposition digest
6/4/2003	BG	2.3	Review and digest George Moniodis deposition
6/9/2003	BG	3.5	Review and digest Herbert Datcher deposition
6/10/2003	BG	3.0	Review and digest Herbert Datcher deposition
6/12/2003	BG	1.5	Review and digest Hendrickson deposition
6/13/2003	BG	2.0	Review and digest Hendrickson deposition
6/15/2003	BG	1.0	Digest second Nancy Stair deposition
6/15/2003	BG	2.0	Digest Hendrickson deposition
6/17/2003	BG	1.5	Digest second Carroll Weyrich deposition
6/25/2003	BG	0.6	Review draft of class cert motion and brief
6/27/2003	BG	0.5	Review UTD's motion for summary judgment
6/30/2003	BG	0.2	Review UTD's affidavits in support of motion for summary judgment
7/3/2003	BG	4.5	Draft statement of disputed facts in opposition to UTD motion for summary judgment
7/5/2003	BG	1.0	Draft statement of disputed facts in opposition to UTD motion for summary judgment
7/8/2003	BG	0.3	Review Datcher testimony for inclusion of cites in brief
7/10/2003	BG	1.5	Revise and edit Opposition to Defendant's Summary Judgment Motion
7/16/2003	BG	0.5	Revise and edit statement of genuine issues
7/18/2003	BG	1.0	Revise and edit opposition to summary judgment
7/22/2003	BG	0.5	Review UTD opposition to class certification
8/4/2003	BG	0.3	Review class cert reply
8/5/2003	BG	0.5	Review defendant's reply in support of summary judgment
10/1/2003	BG	0.8	Tel conf with Judge Brady re: administrative claims; conf with PJS re: same
10/17/2003	BG	0.5	Conf with PJS and DBH re: consolidation/ withdrawal of MCHR cases
10/20/2003	BG	0.2	Conf with PJS re: motion for stay
10/21/2003	BG	0.5	Telephone call with Judge Quarles' clerk re: hearing on motion for class cert; tel conf with PJS, Jeanne Phelan, re: hearing date
10/22/2003	BG	1.0	Telephone call with Judge Quarles' clerk re: hearing on motion for class cert; tel conf with PJS, Jeanne Phelan, re: hearing date
10/23/2003	BG	0.7	Telephone call with Judge Quarles' clerk re: hearing on motion for class cert; tel conf with PJS, Jeanne Phelan, re: hearing date; draft confirming letter to court
10/24/2003	BG	5.0	Draft motion for stay in MCHR proceedings
10/27/2003	BG	0.5	Conf with PJS re: MCHR proceedings
10/28/2003	BG	0.3	Conf with PJS re: MCHR proceedings
11/5/2003	BG	0.6	Draft letter to ALJ Brady re: Continuance of Prehearing Conference
11/6/2003	BG	0.1	Review Judge Brady's response to letter seeking Continuance of Prehearing Conference
11/10/2003	BG	1.0	Conf with PJS re: MCHR proceedings; legal research re: COMAR rules, notice of appearance, pro hac vice admission
11/11/2003	BG	0.3	Draft notice of appearance for RAS for MCHR proceedings
11/12/2003	BG	0.4	Tel conf with ALJ for MCHR re: necessity to appear in person at prehearing conference; prep for MCHR proceedings
11/12/2003	BG	2.0	Conf with PJS, RAS, DBH, SZC re: prep for oral argument on motion for class cert

<u>Date</u>	<u>Atty</u>	<u>Hours</u>	<u>Description</u>
11/13/2003	BG	3.5	Trip to Maryland State Commission hearing on administrative claims; motion to stay and consolidation
11/25/2003	BG	1.0	Draft letters to ALJ responding to info requests for MCHR proceedings
12/3/2003	BG	0.5	Prep for MCHR proceedings with PJS
12/4/2003	BG	0.3	Telephone call w/ Judge Brady re: scheduling
1/12/2004	BG	0.5	Conf with PJS re: MCHR issues
1/14/2004	BG	0.9	Tel conf with Judge Brady re: scheduling issues; conf with PJS re: MCHR issues
1/16/2004	BG	0.1	Review letter from J. Phelan to Judge Quarles re: case status
1/23/2004	BG	0.5	Review decision on class certification motion
1/23/2004	BG	0.5	Draft letter to ALJ Brady re: decision on class cert motion; conf with PJS re: same
1/26/2004	BG	0.3	Revise and edit letter to ALJ Brady re: decision on class cert motion
1/30/2004	BG	0.2	Conf with PJS re: calendar availability for telecon with Court and Phelan; send email to Phelan re: dates for telecon with court
2/2/2004	BG	0.6	Conf with PJS re: mediators; send and receive emails to Phelan re: dates for telecon with court; proposal to mediate; tel conf with Judge Quarles' office re: teleconf date with court
2/5/2004	BG	0.4	Conf with PJS re: prep for conf call with court re: notice and discovery issues
2/6/2004	BG	0.5	Prepare for discovery conference with Judge Quarles
2/6/2004	BG	0.5	Conf with PJS re: magistrate judge settlement conf; discovery issues
2/9/2004	BG	0.1	Review court order referring case to Judge Gauvey
2/9/2004	BG	0.3	Conf with PJS re: union contract issues and mediation issues
2/9/2004	BG	0.4	Draft letter to ALJ Brady re: update on Quarles' referral to mediation serve and fax
2/10/2004	BG	0.2	Conf with PJS re: MCHR settlement conf and notice to class members
2/13/2004	BG	0.2	Review Judge Brady's correspondence re briefing on stay
2/23/2004	BG	0.1	Telephone call with PJS re: Celeste Ireland settlement conf and Lee Hoshall's agreement to stay
2/24/2004	BG	0.1	Review Judge Gauvey's order re: mediation conf dates
2/25/2004	BG	0.1	Conf with PJS re: Judge Gauvey's order re: mediation conf dates
3/10/2004	BG	0.3	ADR, review demand letters
3/19/2004	BG	0.3	Conf with PJS re: punitive damages issues (prep for mediation)
3/26/2004	BG	1.3	Conf with Linda Correia re: bankruptcy issues
3/26/2004	BG	2.0	Legal research re punitive damages issues (prep for mediation)
3/30/2004	BG	0.5	ADR, meeting w/ DBH, RAS, PJS re: settlement
3/31/2004	BG	14.5	ADR, settlement conference with Judge Gauvey 9:30 to 9:00 (and travel time including picking up Plaintiff Veronica Johnson 3.0)
4/5/2004	BG	0.1	Telephone call with Phelan re: list of 2001 class members in NLRB settlement
4/8/2004	BG	0.1	Telephone message for Phelan re: list of 2001 class members in NLRB settlement - follow up
4/12/2004	BG	0.3	Telephone call with Phelan re: list of 2001 class members in NLRB settlement - follow up; conf with PJS re documents showing class members and hours worked
4/13/2004	BG	0.5	Review draft consent order; revise and file motion for ext of time to file consent order
4/15/2004	BG	1.7	Review draft consent order with DBH, PJS, RAS
8/5/2004	BG	0.2	Review e-filed claim by class member Trena Williams; email from PJS re: procedure for forwarding to M. Patton
8/6/2004	BG	0.2	Review claim questions with EAW - email to Phil re: identities of departments 100-500
9/17/2004	BG	0.2	Telephone call with Herbert Datcher
10/21/2004	BG	0.2	telephone call with Melvin Newsome re: class settlement hearing, attendance at hearing

<u>Date</u>	<u>Atty</u>	<u>Hours</u>	<u>Description</u>
Subtotal		304.6	
2/10/2003	TMK	0.3	Calls to clients/potential witnesses re: racism in workplace
2/11/2003	TMK	0.5	Calls to clients re: racism in workplace
2/12/2003	TMK	0.3	Calls to clients re: racism
2/27/2003	TMK	0.8	Calls to clients re: racism in workplace; tracking down phone numbers
2/28/2003	TMK	0.3	Calls to clients re: racism in workplace
3/5/2003	TMK	1.3	Calls to clients re: racism in workplace; typing up notes from calls; talking with PJS
3/7/2003	TMK	0.4	Calls to clients re: observation of racist behavior & remarks
3/12/2003	TMK	0.4	Calls to clients re: racist behavior and remarks; tracking down phone numbers
3/13/2003	TMK	0.4	Calls to clients re: racism in workplace
3/31/2003	TMK	0.5	Sorting/editing files; editing spreadsheet; calls to clients
3/31/2004	TMK	0.8	Telephone calls with PJS, re: Financial Statements, contacting Pasquale Hernandez & consent decree language
8/5/2004	TMK	0.9	Confer with DBH & EAW re: calls from potential class members; review materials being sent to potential class members; telephone call w/potential class members; log call in Excel spreadsheet
8/13/2004	TMK	0.1	Telephone call with potential class member re claim form
8/17/2004	TMK	0.4	Telephone calls with class members re: settlement claim forms; log same
8/18/2004	TMK	0.3	Telephone calls with class members; email to administrator; log inquiries
8/19/2004	TMK	0.2	Telephone calls with class members; log entries
8/20/2004	TMK	0.2	Email correspondence w/administrator re: address of class members; enter in log
8/23/2004	TMK	0.2	Telephone call with class member; email to PJS and DBH; scan letters from class members
8/24/2004	TMK	0.2	Telephone call with class member; emails to Mark Patton, administrator; log data
8/25/2004	TMK	0.1	Telephone call with class member, log data for same
8/30/2004	TMK	0.1	Telephone call with Celeste Ireland re: status of settlement & log same
8/31/2004	TMK	0.7	Telephone calls with class members; log entries re: same; email Mark Patton w/address info; confer with DBH & draft acknowledgment form re: ees who submitted both claim form and Opt-Out form
9/1/2004	TMK	0.6	Telephone calls with class members; log same; emails to Mark Patton; confer with DBH & revise letter to members who submitted both Claim and Opt-Out forms
9/2/2004	TMK	0.8	Telephone calls with class members; letters to same re: choosing only one form; email M Patton with new addresses for class members requesting packets
9/3/2004	TMK	0.2	Telephone calls with class member, letter to same re: forms submitted
9/7/2004	TMK	0.4	Telephone call with class member, email M. Patton for packets, log data
9/9/2004	TMK	0.5	Confer with BNG re: Pasquale Hernandez; confer with DBH re: Pasquale Hernandez; telephone call with P. Hernandez re: membership in class
9/13/2004	TMK	0.2	Telephone call with class member; log same; email Mark Patton w/info
9/15/2004	TMK	0.4	Telephone call with class members; email Mark Patton; confer with DBH re opt-outs & letter to Jeanne Phelan
9/17/2004	TMK	0.4	Confer with DBH re claimants; send letter to J Phelan; email Mark Patton
9/19/2004	TMK	0.7	Telephone calls & letters to class members who submitted both forms
9/21/2004	TMK	0.3	Telephone calls with class members; email Mark Patton; log entries
9/22/2004	TMK	0.5	Letter to class members re: dual forms; emails with M. Patton re status; telephone call with Charles Mann
9/24/2004	TMK	0.5	Copy forms from class members & draft letter to M. Patton re: same (.4); email PJS with update (.1)

<u>Date</u>	<u>Attv</u>	<u>Hours</u>	<u>Description</u>
9/27/2004	TMK	1.2	telephone call with Pasquale Hernandez (.1); confer with DBH re claims & opt-outs & Hernandez (.2); telephone calls with class members (.4); email Mark Patton (.1); mail packets to class members (.2); telephone call with D atty re: brief accepting consent decree & Pasquale Hernandez (.2)
9/28/2004	TMK	0.2	Mail materials to class member (.2)
9/29/2004	TMK	0.3	E-file notice with court (.2); telephone calls to opt-outs (.1)
9/30/2004	TMK	0.6	Scan doc & email M. Patton; telephone call opt-outs; confer with DBH; letter to opt-outs & mail same
10/4/2004	TMK	1.0	Telephone calls with class members; fax form to class member; draft letter to class member & send packet; email to M. Patton
10/5/2004	TMK	0.9	Telephone calls to class members; confer with DBH
10/6/2004	TMK	1.6	Telephone calls with class members; log same; copy & mail packets; confer with DBH; scan documents; review email Mark Patton & write back
10/7/2004	TMK	1.0	Print out and review problematic claim forms; telephone calls to class members; letter & form to C. June
10/8/2004	TMK	0.8	Letters to class members re social security numbers (.7); confer with DBH (.1)
10/11/2004	TMK	1.3	Letters to class members re social security numbers
10/12/2004	TMK	0.6	email Mark Patton & fax Patton re same & new address for class member &
10/14/2004	TMK	1.1	Confer with DBH re: loose ends re: claim forms & re: Patton's next steps (.3); letters to class members re: reasons for opting out, etc. (.4); draft memos to file re: unusual cases & steps taken re: ss# problems, etc. (.3); email Jeanne Phelan re: claimants not in our database (.1)
10/15/2004	TMK	0.5	Memo to file re: P. Hernandez; review list of claimants & telephone call to class member confirming claim form received; review outstanding claim issues
10/19/2004	TMK	0.6	Confer with DBH re: calculation of hours, backpay, instructions for Mark Patton (.3); telephone call to Mark Patton & review email from same re: questions on calculating information and generating report (.2); telephone call to class member re claim form (.1)
10/20/2004	TMK	0.3	Telephone call with Mark Patton re: data for class members, missing information, report to be generated
10/21/2004	TMK	2	telephone calls with class members re claim forms; review untimely forms; confer with DBH re same; letter to class member re opt out; telephone call to Mark Patton re calculating information; telephone calls to Andre Wheatfall re claim form & letter to same; confer with DBH re Wheatfall & Harrison; letter to class member D. Harrison; confer with GRW re fees report; review fees report
10/22/2004	TMK	1.1	class members; telephone calls with Patton re same; telephone call with class
10/22/2004	TMK	0.4	email Paula Coukos re: brief on class issues (.2); review fees statement (.2)
10/27/2004	TMK	0.1	review email from Mark Patton re: missing data for claimaints
10/28/2004	TMK	2.2	review file & status of problematic claim forms and email Mark Patton (1); telephone calls to class members re social security #s (.1); proofread & edit fees summary (.5); draft memo re: outstanding claims form matters (.6)
10/29/2004	TMK	2	telephone call with M Patton re: missing data & report from SSI (.1); letter to
11/1/2004	TMK	0.2	review email from M. Patton re: results & report draft; respond to same (.2)
Subtotal		34.8	
12/10/2002	JLC	3.6	Reviewing 1998 employee files and determining race of employees
12/11/2002	JLC	1.7	Determining races of individuals from employee files for databases
12/13/2002	JLC	2.6	Reviewing database printout and calculating correct hours worked on voucher payments
12/15/2002	JLC	1.5	Reviewing voucher payments
12/16/2002	JLC	4.0	Reviewing voucher payment and figuring out hours
12/17/2002	JLC	3.5	Reviewing voucher payments and making corrections on databases

<u>Date</u>	<u>Atty</u>	<u>Hours</u>	<u>Description</u>
12/18/2002	JLC	7.3	Reviewing database files/checking against paychecks for accuracy of hours/earnings; making changes to database
12/19/2002	JLC	3.2	Comparing database/paychecks for accuracy of figures
12/20/2002	JLC	4.6	Reviewing database and comparing paychecks; making changes to database
12/27/2002	JLC	5.8	Travel to Baltimore and review files for voucher payment explanation
12/30/2002	JLC	3.7	Reviewing discovery requests and class reps files to respond
1/2/2003	JLC	3.7	Reviewing discovery requests and client files; changing database figures from vouchers
1/3/2003	JLC	8.0	Reviewing files at UTD in Baltimore
1/6/2003	JLC	7.0	Doing calculations from vouchers; deleting vouchers from paychecks when not in OPF
1/7/2003	JLC	9.3	Reviewing databases and OPFs; inputting corrections
1/8/2003	JLC	3.0	Finalizing databases; reviewing corrections for accuracy
1/29/2003	JLC	1.0	Reviewing race from 1998 database and NEI forms
4/1/2003	JLC	9.0	Review files in Baltimore (including travel time)
4/10/2003	JLC	0.8	Reviewing wage and voucher records
4/22/2003	JLC	1.5	Reviewing pay records for voucher explanations
4/23/2003	JLC	3.0	Reviewing employee time records and summary sheets, comparing to deleted vouchers and checking database for accuracy
4/24/2003	JLC	2.3	Reviewing summary time sheets and deleted vouchers
Subtotal		90.1	
GRAND TOTAL		1,811.2	